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Principal

December 31, 2003

The Honorable Dale Hardy Roberts
Secretary, Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

Dear Judge Roberts:

Re: TX-2004-0106

Attached are comments from MCI and its certificated subsidiaries ("MCI"). MCI concurs in the comments of AT&T Communications of the Southwest, Inc. as well as generally in the comments of the MTIA. MCI's additional comments regarding each recommended change follow.

Thank you for the opportunity to file comments. Should you have any questions or comments, please feel free to contact me. I would welcome the opportunity to discuss these comments further with you or with the Commission Staff.

Very truly yours,

/s/ Carl J. Lumley

Carl J. Lumley

cc. Office of Public Counsel
General Counsel

Comments Regarding Proposed Rule Changes from MCI

4 CSR 240-3.500(21) and 4 CSR 240-32.020(36) – Service objective – an acceptable level of service of an established category of service as identified in 4 CSR 240-32.080. Service objectives should be maintained [on an exchange-specific basis or as otherwise monitored] according to 4 CSR 240-32.080.

Comments: MCI asserts that the cost of complying with a rule requiring information on an exchange-by-exchange basis would cost the company more than $500 to comply, because MCI does not track its performance on an exchange-by-exchange basis. As a practical matter, such a detailed reporting requirement would not be realistic or meaningful because the proposed metrics are designed to measure switch performance. Since MCI uses one switch to provide local service in more than one exchange, the reportable metrics would be the same for all exchanges, thus rendering the proposal meaningless. Accordingly, MCI suggests that this proposal be deleted.

4 CSR 240-32.080(5)(C)3. – continuously, on a company-wide basis, if a company provides this service by contractor service, the company providing the basic local service shall monitor the contractor's performance and report it as the local service provider's results.

Comments: MCI would suggest the following modification to AT&T's alternate suggestion by relieving the local service provider of the reporting requirement if the underlying provider leasing the service facilities fails to give the local service provider the service performance report.