## HOPPING GREEN & SAMS

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

www.hgss.com

ERIC T. OLSEN
GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
D. KENT SAFRIET
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
DAN R. STENGLE
CHERYL G. STUART
JENNIFER A. TSCHETTER
VICTORIA L. WEBER

ANGELA R. MORRISON

OF COUNSEL ELIZABETH C. BOWMAN REX D. WARE

Writer's Direct Dial No. (850) 425-2359

June 28, 2002

### BY HAND DELIVERY

JAMES S. ALVES

DIANE W. CARR

RALPH A. DEMEO

WILLIAM H. GREEN

MATTHEW L. HICKS

GARY K. HUNTER, JR.

FRANK E. MATTHEWS

RICHARD D. MELSON

KYLE V. MITCHELL

JONATHAN T. JOHNSON ROBERT A. MANNING

WADE L. HOPPING

BRIAN H. BIBEAU

RICHARD S. BRIGHTMAN

T. SPENCER CROWLEY, III

KEVIN B. COVINGTON

BRIAN A. CRUMBAKER

PETER C. CUNNINGHAM

Blanca Bayó
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re:

Docket No. 000121B

Dear Ms. Bayó:

Enclosed for filing are the original and fifteen copies of WorldCom's Comments. By copy of this letter, copies have been furnished to the parties shown on the attached certificate of service. If you have any questions regarding this filing, please give me a call at 425-2359.

Very truly yours,

Gary V. Perk

GVP/jlm Enclosures

cc: Certificate of Service

DOCUMENT NUMBER-DATE

06776 JUN 288

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the	)	Docket No. 000121B-TP
Establishment of operations support	)	
Systems permanent performance	)	Filed: June 28, 2002
Measures for incumbent local exchange	)	
Telecommunications companies.	)	
	)	

## COMMENTS OF WORLDCOM, INC.

MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc. (collectively "WorldCom") believe the metrics and benchmarks proposed by Sprint in this docket are inadequate. Although WorldCom does not plan to participate to the fullest extent in this docket, WorldCom is dismayed by many of the benchmarks proposed by Sprint.

After careful and extensive review, the Commission has established performance measures and remedies for BellSouth Telecommunications, Inc. in Docket No. 000121-TP. The BellSouth Plan is quite thorough and would be a strong model for the Commission to use in its review of Sprint's plan. At a minimum, Sprint should at least be required to ramp up from the Nevada flow-through levels to that the Commission has established for the BellSouth plan. Further, WorldCom does not want to foreclose the opportunity to revisit the metrics, benchmarks and remedies as its market activities in Sprint's territory increase.

WorldCom respectfully urges the Commission to adopt the Nevadla measures and remedy plan to cover the metrics Sprint proposes in this proceeding and to have periodic reviews of the plan after it has been established.

Respectfully submitted this 28<sup>th</sup> day of June, 2001.

Donna Canzano McNulty

WorldCom, Inc.

325 John Knox Road

The Atrium Building, Ste. 105

Tallahassee, FL 323O3

(850) 422-1254

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery (\*) and/or regular U.S. mail to all known parties of record in Docket No. 000121B this 28<sup>th</sup> day of June, 2002.

Jason Fudge\*
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

AT&T (GA) Virginia C. Tate/Lisa A. Riley 1200 Peachtree St., NE Suite 8100 Atlanta, GA 30309

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32301

Sprint Communications Company Limited Partnership
Susan Masterton/Charles Rehwinkel
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214

Time Warner Telecom of Florida, L.P. Ms. Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069-4002