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October 9, 2000

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Re: Case No. U-12598
Opening Brief of WorldCom

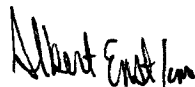
Dear Ms. Wideman:

Enclosed please find original and four copies of the Opening Brief of WorldCom in the above referenced matter. Also enclosed is Proof of Service upon the Parties of Record.

If there are any questions or comments, do not hesitate to contact me.

Sincerely,

DYKEMA GOSSETT PLLC



Albert Ernst

AE/jmb
Enclosures
cc: Jim Denniston
Parties of Record

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**STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

* * * * *

In the matter, on the Commission's own motion,)
to establish service quality standards, including) Case No. U-12598
enforcement provisions, for Ameritech Michigan.)

OPENING BRIEF OF WORLDCOM

Now Come MCImetro Access Transmission Services, Inc., Brooks Fiber Communication of Michigan, Inc., MCI WorldCom Communications, Inc., collectively referred to as "WorldCom", and respectfully submit this opening brief, and in support, state as follows:

If there is a need for enhanced service quality standards, Staff has shown adequate justification for applying those enhanced standards only to Ameritech. In addition, the imposition of enhanced standards to CLECs is not justified by customer complaints against CLECs. Furthermore, the marketplace already provides adequate policing of CLEC service quality because CLEC customers can easily leave a CLEC for Ameritech (or even another CLEC) if a CLEC fails to meet customer expectations.

In the Staff testimony of Ron Choura (Tr 323-324) there is a statement about application to other companies. Mr. Choura makes an excellent point about the market conditions and that standards should be applied differently in a monopoly compared to a competitive market.

Where CLECs rely on Ameritech to provision unbundled network elements, the quality of service CLECs provide to customers depends to a large extent upon the level of service CLECs receive from Ameritech. It would be unfair to hold CLECs accountable for service quality problems that are not under their control. Since the quality of service provided to CLEC customers is dependent upon the quality of service provided by Ameritech to the CLEC, it is especially important

to make sure that the quality of service provided to CLECs is very high. Poor service quality to CLECs can have a cascade effect, reducing the quality of service to greater numbers of customers than would otherwise be possible, and ultimately damaging the entire market by reducing competitive choices for telecommunications services. Therefore, at a minimum, the enhanced standards which are adopted in this docket as applying to Ameritech's end-users should also apply to services provided by Ameritech to CLECs on a resold or unbundled basis.

Respectfully submitted,
WORLD.COM

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November 9, 2000
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Case No. U-12598

[illegible]

Angela L. Scott


Amy L. DeBruler, Notary Public
Eaton, Acting in Ingham Co, MI
My commission expires: 12/03/03

U-12598 SERVICE LIST

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