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November 15, 2000

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

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

Dear Ms. Wideman:

Enclosed please find original and four copies of the Response 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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ID\AE

S T A T E O F M I C H I G A N
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.)

RESPONSE 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 response brief, and in support, state as follows:

Most of the issues raised by Ameritech in its initial brief have already been covered by the opening briefs and responses to the summary judgment filed by the other parties. Accordingly, this brief focuses on an issue not previously addressed.

Ameritech, at page 14, footnote 13, of its initial brief claims that Section 253(b) of the Federal Telecommunications Act prohibits quality standards which are only applicable to Ameritech. Ameritech is incorrect. Sections 253(a) and (b) provide as follows:

SEC. 253. REMOVAL OF BARRIERS TO ENTRY.

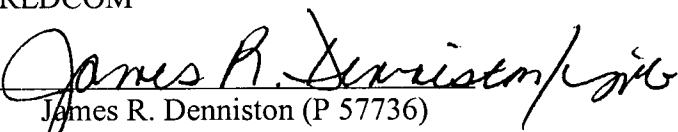
(a) **In General:** No State or local statute or regulation, or other State or local legal requirement, may prohibit or have the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service.

(b) **State Regulatory Authority:** Nothing in this section shall affect the ability of a State to impose, on a competitively neutral basis and consistent with section 254, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services, and safeguard the rights of consumers.

First, this section only applies to removing barriers to entry. Secondly, Section 254 referenced above refers to that section of the Federal Telecommunications Act which addresses Universal Service. Universal Service addresses the concepts of competitive neutrality (Sections 254(b)(4), 254(d), and 254(h)(2)), public safety and welfare (Section 254(c)(1)(A)), quality of telecommunication services (Section 254(b)(1)), and rights of consumers (Section 254(b)(3)).

Accordingly, Section 253(b), which is relied upon by Ameritech, when viewed in context only applies to entry of CLECs into the ILEC territories and that the Commission may not raise barriers to CLEC entry. The present proceeding does not seek to impose requirements on CLECs and therefore does not restrict CLEC entry and therefore does not violate Section 253.

Respectfully submitted,
WORLDCOM

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November 15, 2000

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

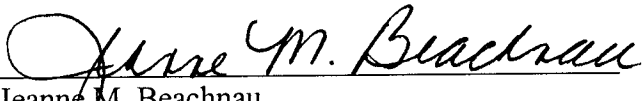
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In the matter, on the Commission's own motion,)
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PROOF OF SERVICE

STATE OF MICHIGAN)
) SS.
COUNTY OF INGHAM)

Jeanne M. Beachnau, being first duly sworn, deposes and say that on the 15th day of November, 2000, she caused to be served upon the persons listed in the attached Service List, copies of the Response Brief of WorldCom in the above-captioned matter by United States First Class and electronic mail.



Jeanne M. Beachnau

Subscribed and sworn to before me
this 15th day of November, 2000.



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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