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May 24, 2002

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
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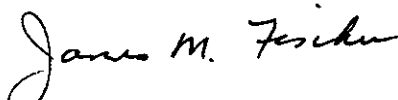
RE: *In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangements, and Traffic Measurement, Case No. TO-99-593*

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Reply Of Verizon Midwest To MITG's Response To The Staffs May 7th Report Regarding OBF Issue 2056. A copy of the foregoing Reply has been hand-delivered or mailed this date to all parties of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

Enclosure

cc: Counsel of record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Investigation into	)	
Signaling Protocols, Call Records, Trunk	)	Case No. TO-99-593
Arrangements and Traffic Measurement	)	

REPLY OF VERIZON MIDWEST
TO MITG'S RESPONSE TO THE STAFF'S
MAY 7TH REPORT REGARDING OBF ISSUE 2056

COMES NOW GTE Midwest Incorporated d/b/a Verizon Midwest ("Verizon") and, pursuant to 4 CSR 240-2.080(16), submits the following Reply to MITG's Response To Staffs May 7 Report on the Status of Implementation of Ordering and Billing Forum Issue 2056:

1. On May 14, 2002, the Missouri Independent Telephone Company Group (MITG) filed its Response of the MITG to Staffs May 7 Report on the Status of Implementation of Ordering and Billing Forum Issue 2056 ("Response"). In its Response, MITG attempts to "supplement" the Staffs May 7 Status Report with its own view of the position of Verizon and other larger ILEC carriers (i.e., Southwestern Bell, Sprint, and ALLTEL). Unfortunately, MITG is laboring under fundamental misunderstandings of the positions of Verizon and the other Large ILECs in this proceeding, and as a result, the Commission should not be misled by MITG's comments.

2. First, MITG appears to misunderstand the position of Verizon and the other Large ILECS relating to the traffic for which OBF Issue 2056 applies. According to MITG, "the former PTCs take the position that OBF Issue 2056 does not apply to traffic on the Feature Group C common trunks..." (MITG Response, p. 1) This is not true. On April 19, 2002, the

large ILECs answered a questionnaire distributed by the Staff in which ALLTEL, Sprint, SWBT and Verizon provided responses to approximately 46 detailed questions regarding their position and understanding of the OBF 2056-related issues. On page 6 of the OBF Questionnaire, Verizon and the large ILECs clearly stated that **"OBF 2056 and MECAB 7 were developed to apply to all IXC, ILEC, CLEC and CMRS usage that is exchanged between service providers that have agreed to implement Meet-point billing according to the MECAB guidelines... OBF 2056 applies to all jurisdictions of traffic that are exchanged between service providers that have agreed to implement Meet-point billing according to MECAB guidelines."** (emphasis added). MITG therefore must have misunderstood the position of Verizon and the other large ILECs on this point.

2. Unfortunately, based upon this fundamental misunderstanding, MITG cast needless aspersions on Verizon and its principal witness, Kathryn Allison. In para. 6 of its Response, MITG states:

Verizon witness Allison was the champion in persuading the Commission to implement OBF Issue 2056. This Commission obviously relied heavily upon her testimony that OBF Issue 2056 would reduce or eliminate disputes regarding the traffic in this docket. Now Verizon says OBF Issue 2056 does not apply. This change of position is disturbing. (MITG Response, p. 5)

3. Verizon's current position in this proceeding is consistent with the position it espoused during the hearings. The Commission should not be misled by MITG's misstatements that Verizon has changed its position.

4. Verizon witness Kathryn Allison discussed in her Rebuttal Testimony in this proceeding the recent adoption of new national industry standards by the Ordering and Billing Forum for the telecommunications industry which are expected to improve the current record exchange and bill validation process among the various types of carriers (e.g. ILECs, CLECs,

IXCs, and wireless carriers). Ms. Allison outlined the OBF's new standards (i.e. OBF Issue 2056 and the MECAB 7 standards) in her Rebuttal Testimony (Ex. No. 20, pp. 5-6) which have been formally adopted by the OBF and will be implemented by August 31, 2002, as follows:

Today there is a meet point process for access (IXC) usage, in which industry standard Category 11-01 records are exchanged between LECs. This existing process is outlined in the OBF's Multiple Exchange Carrier Access Billing (MECAB) Guide. Issue 2056 proposes changes to the MECAB process that would streamline the record exchange and include a local and intraLATA meet point record exchange process. Issue 2056, when accepted and implemented, would provide guidelines and a consistent, industry-standard process for meet point or meet point-like record exchanges and billing processes for facility-based LECs, CLECs, and wireless providers for access, local and intraLATA toll usage.

Issue 2056 was originally submitted to OBF in November 1999 and received final approval on November 8, 2000. Time Warner, Bell South, SBC, Qwest, Verizon Midwest, AT&T (CLEC), Sprint (CLEC & ILEC), and Sprint Spectrum are just a few of the providers that worked on this issue and are members of OBF.

Issue 2056 specifies that each provider will be responsible for recording its own usage, both originating and terminating. This will enable the LECs to bill terminating usage as well as perform bill validation. If a LEC does not have the ability to record its own usage, Issue 2056 contains a process by which the provider can obtain copies of records from the originating, transiting or terminating provider.

During the hearings, Ms. Allison elaborated upon the enhancements that will result from the adoption of Issue 2056 and MECAB 7. (Tr. 655-59). She testified that the Issue 2056 standards will overlay the existing records exchange process. Both originating and terminating records will be made and used to verify that the proper billing for traffic is occurring among the various carriers. In addition, the new standards mandate that any of the carriers that handle a call will be permitted to request records from other carriers involved in that call to help identify the traffic and ensure that the call is being properly billed. (Tr. 656-57).

The billing process for CLEC traffic, for example, will be enhanced by the adoption of OBF Issue 2056, and should help to resolve billing and recording concerns raised by the small ILECs in this proceeding related to CLEC traffic. For CLEC traffic, Verizon uses the existing industry standard category 11-01 record exchange. The CLEC trunk group is established as a meet point, so that Verizon provides an 11-01 record to LEC end offices behind a Verizon tandem for all CLEC-originated traffic. This enables the subtending LEC to bill the originating CLEC for terminating charges. If the originating number is missing from the record, the CLEC meet point trunk is translated to insert the CLEC's Carrier Identification Code (CIC), which is populated in the 11-01 record. Another record, an 11-50 record, is returned to Verizon from the terminating LEC so that Verizon can bill a transiting charge to the originating CLEC. (Ex. No. 20, pp. 3-4)(Tr. 615).

However, under the new OBF 2056 standards, both the terminating office owner and the tandem owner will be in a position to properly bill the CLEC for their respective access and transiting charges. (Id.) It will no longer be necessary for the tandem owner to wait for the return of the Category 11-50 records for the billing process to be completed. (Tr. 656). Both the terminating end office owner and the tandem company will be able to bill their respective charges using the Category 11-01 originating records which will include the CIC codes.

As explained by Ms. Allison, the adoption of OBF 2056 will also help all companies involved in the traffic to ferret out any problems that may result in the measurement and billing process. (Tr. 657). The new standards gives all of the companies along the call route the ability to go to any other carrier involved in the call and request records to help identify the traffic and the appropriate company to be billed for the traffic. OBF 2056 has been included in the MECAB documents and will constitute national standards and guidelines for billing. (Id.) It will give

both the terminating company and the tandem owner the ability to make records that will be used for bill validation purposes. As a result, although the billing will continue to be based upon originating records, as it is today, there will be additional records to compare to the originating records. (Tr. 657-58). The position espoused by Kathryn Allison during the hearings continues to be the position of Verizon today.

5. Verizon also concurs in the Reply to MITG filed by Southwestern Bell on May 24, 2002.

WHEREFORE, having responded to the Response of MITG to Staffs May 7 Report on the Status of Implementation of Ordering and Billing Forum Issue 2056, Verizon respectfully requests that the Commission takes its position into account as it proceeds in this matter.

Respectfully submitted,

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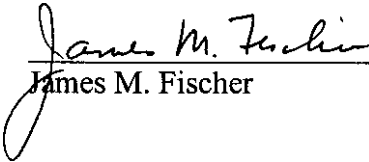
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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail or via hand delivery on May 24, 2002.


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