

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65102-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 634-7431

DAVID V.G. BRYDON

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN

CHARLES E. SMARR

DEAN L. COOPER

MARK G. ANDERSON

TIMOTHY T. STEWART

GREGORY C. MITCHELL

BRIAN T. MCCARTNEY

DALE T. SMITH

BRIAN K. BOGARD

OF COUNSEL

RICHARD T. CIOTTON

September 7, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Re: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing in above referenced matter, please find an original and eight copies of the STCG's Reply Comments to Staff's Report.

Please see that this filing is brought to the attention of the appropriate Commission personnel. Copies of the attached are being sent to all parties of record. I thank you in advance for your cooperation in this matter.

Sincerely,

Brian T. McCartney

Brian T. McCartney

BTM/da

Enclosure

cc: Parties of Record

FILED³
SEP 7 2001
Missouri Public
Service Commission

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

SEP 7 2001

In the Matter of the Investigation into Signaling)
Protocols, Call Records, Trunking Arrangements,)
and Traffic Measurement.)

Missouri Public
Service Commission
Case No. TO-99-593

THE STCG'S REPLY COMMENTS TO STAFF'S REPORT

I. SUMMARY

1. Ordering and Billing Forum (OBF) Issue No. 2056 does not address the primary issues in this case. Issue No. 2056 is not intended to create record flows where they do not exist, or to change flows related to intraLATA messages. In addition, the fundamental issues related to the differences in the traffic that is recorded by the small companies and the records that are being made and passed to the small companies by the former PTCs are not addressed by Issue No. 2056.

2. OBF Issue No. 2056 is an optional industry proposal that has not been adopted by or even fully presented to Missouri's telecommunications industry. Thus, OBF Issue No. 2056 cannot address the immediate problems of the originating records system in a post-PTC Plan environment.

3. Although the OBF considered Issue No. 2056 to be "resolved" in November of 2000, Staff's Report recognizes that the "proposed" implementation of Issue No. 2056 is not expected to be completed until August 31, 2002. In the meantime, the former PTCs continue to send traffic for which the small companies are not receiving compensation. The small companies should not be forced to wait another year, or longer, for the implementation of Issue No. 2056, particularly when it will have no meaningful impact on the problem.

II. DISCUSSION

4. **Historical Background for the current record flows that are being addressed by Issue No. 2056.** In establishing the billing procedures related to access billing to interexchange carriers for originating and terminating traffic where more than one local exchange company (LEC) is providing access, the interexchange carriers were anxious for billing units from end office LECs to match the billing units for other LECs who transited the traffic from the tandem (i.e. the tandem LECs) to ease the burden of auditing and verifying CABS bills. Record flows were established to provide the tandem LEC with the access minutes billed by the end office LEC so that the tandem LEC access bill for transit to or from each central office of the end office LEC would match (in minutes) the bill rendered by the end office LEC.

5. **Originating Traffic.** For originating traffic, the end office LEC (which typically records the call) would generate an 11-50-xx summary record by carrier by day from each end office showing the total access minutes to be billed for that day. This record was (and is) used by the tandem LEC to render the bill for its transport costs associated with the calls to that carrier.

6. **Terminating Traffic.** For terminating traffic, normally measured by the tandem LEC who receives the call directly from the IXC, the tandem LEC would measure each call and provide to the end office LEC a call detail record, 11-01-xx, record. The end office LEC would process these individual records through its CABS billing system and create 11-50-xx records to return to the tandem LEC so the billing records and periods would match. In most cases, this resulted in the end office LEC

returning to the tandem LEC, in a different format (summary records), information for billing which the tandem LEC initially had in its possession.

7. **OBF Issue No. 2056.** With the passage of time and growing familiarity with the access billing process, and with new processes developed for billing related to unbundled network elements, it apparently became too cumbersome to continue to coordinate and assure the billing of the same minutes from both the end office LEC and the tandem LEC. Issue No. 2056 proposes to eliminate the need for coordinated minutes (common minutes) between the two LECs and to simplify the access billing issues. Basically, the primary change contemplated by Issue No. 2056 is that the 11-50-xx summary records and the processes associated with coordinating billing between the two LECs will be eliminated and, after August, 2002, the 11-50-xx summary records will no longer be required. (See Attachment A, OBF Issue 2056, Part A, Page 2, third paragraph of resolution statement; see *also* OBF Issue 2056, Part B, Page 1, third paragraph.)

8. **OBF Issue No. 2056 does not address the primary issues in this case.**

The implementation of Issue No. 2056 will eliminate the use of 11-50-xx summary usage records and some of the transfer of records between LECs, but it will not address the primary issues that are being considered in this case. Issue 2056 is not intended to create record flows where they do not exist, or to change flows related to intraLATA messages. In fact, Issue No. 2056 does not appear to affect the termination of intraLATA toll and the billing and measurement of that traffic. (Tr. 112) Issue No. 2056 is not a solution that can address the immediate problems of the originating

records system, and it is unclear if it will ever do so. This is evidenced by numerous statements contained within Issue No. 2056 itself. For example:

1. "It was questioned if the intent was to change existing processes developed as a result of state directives or contractual agreements? ***It was advised that MECAB doesn't control state directives or contractual agreements today, so nothing would change, unless the contract referred to specific MECAB guidelines.***"¹

2. "A participant advised that today there may not be record exchange between local or Intra-LATA usage. Was the intent to change this? ***It was explained that if record exchange was not required today, then this process would not change.***"²

3. "It was also questioned if the existing category 92 record process would be changed. ***However, it was stated that Category 92 records are not addressed in this forum but is a state/company driven process that would not be changed by this issue.***"³

These statements, combined with the description of the changes, indicate that Issue No. 2056 will eliminate the 11-50-xx summary records and use 11-01-xx detail records in the place of those records where they are currently being utilized. But Issue No. 2056 does not deal with creating new records for local or intraLATA usage where they are not currently being generated, nor does it deal with changes in the Category 92 record process that is still being used by the former PTCs. Thus, the fundamental issues related to the differences in the recordings that are being made and passed to

¹ See Attachment A, OBF Issue No. 2056, Part B, p. 8 (emphasis added)

² *Id.* (emphasis added)

³ *Id.* at p. 9 (emphasis added)

the end office LECs and the records recorded by those LECs are not addressed by Issue No. 2056.

9. **The status of Issue No. 2056 in Missouri.** At this point in time, Issue No. 2056 does not appear to have been implemented by any of the small companies in Missouri. Implementation will depend primarily on the ability of SWBT and the other "intermediate" tandem LECs to receive and process 11-01-xx detail records instead of 11-50-xx summary records. The small companies have not been contacted by SWBT, Sprint, or Verizon to coordinate implementation of this change. OBF Issue No. 2056 is an unproven proposal that is simply too new and unclear to be used as a basis for any decision regarding the issues presented in this case. (Tr. 140, 507)

10. **OBF Issue No. 2056 is entirely optional.** Staff's Report at page one explains, "It is important to note, however, that no company is required to comply with these guidelines, and that some companies may choose not to do so." The small companies have presented evidence of a real problem with records exchange and intercompany compensation in the post-PTC Plan environment. In response, Verizon offers an optional industry standard that is not due to be implemented for at least another year. The small companies should not be forced to wait another year for an optional standard that does not resolve the issues in this case. The issues presented to the Commission are ripe for decision.

11. **The Small Companies' proposal is consistent with OBF Issue No. 2056.** The small company proposal is entirely consistent with OBF Issue No. 2056. Therefore, in the event that Issue No. 2056 is eventually adopted in Missouri, it would

complement rather than conflict with the STCG's proposal. Verizon's witness on Issue No. 2056 admitted this during the hearing:

Q. 2056 could overlay a change in the business relationship, couldn't it, and help to provide you with the assurance and ability to get the necessary records from us, the small companies, even if we change the business relationship?

A. That's one possibility of many.

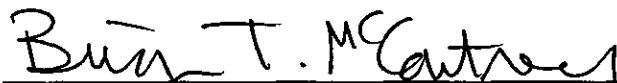
(Tr. 627)

12. **OBF Issue No. 2056 in a Competitive Environment.** Staff's Report recognizes that Issue No. 2056's "desired effect is to be less reliance of one company upon the records provided by another." The STCG believes that in a competitive environment, no carrier should be forced to rely on the records of another carrier in order to receive compensation. This is especially true when both recent history and the results of the Network Test demonstrate that the former PTCs' originating records are inaccurate and ripe for error. Missouri's small companies should be allowed to use their own records to receive compensation for the services that they provide. The former PTCs are now providing or are poised to begin providing interLATA toll services, and they should be required to use the same system that is being used in the competitive interexchange toll environment by the traditional long distance carriers such as AT&T and MCI/WorldCom. The business model proposed by the STCG is the most efficient, the most equitable, and provides the proper incentives for all of the companies involved.

III. CONCLUSION

As a threshold matter, OBF Issue No. 2056 does not address the issues in this case. As a practical matter, OBF Issue No. 2056 is an optional standard, it is untested, and it is not due to be implemented for at least another year. The Commission terminated the PTC Plan and opened this case over two years ago. The record in this case clearly demonstrates that the present system is not providing all of the appropriate records for terminating traffic, and Issue No. 2056 will not fill that void. In a competitive environment: (1) all interexchange carriers should be placed on equal footing; and (2) the small companies should not be forced to bear the risk for the former PTCs' recording mistakes and the unidentified traffic that the former PTCs deliver to the small companies. The Commission should adopt the STCG's proposal and end the anti-competitive, discriminatory, and inherently flawed originating records system supported by the former PTCs.

Respectfully submitted,



W.R. England, III Mo. Bar #23975
Brian T. McCartney Mo. Bar #47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, Missouri 65102-0456
(573) 635-7166
trip@brydonlaw.com
brian@brydonlaw.com

Attorneys for the STCG

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 7th day of September, 2001, to:

Mike Dandino
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

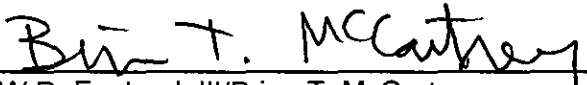
Jim Fischer and Larry Dority
Fischer and Dority, P.C.
101 Madison, Suite 400
Jefferson City, MO 65101

Leo Bub
Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, MO 63101

Craig Johnson
Andereck, Evans, Milne, Peace & Johnson, LLC
700 E. Capitol
Jefferson City, MO 65102

Lisa Creighton Hendricks
Sprint Missouri, Inc.
5454 W. 110th Street
Overland Park, KS 66211

Carl Lumley/Leland B. Curtis
Curtis, Oetting, Heinz, Garret & Soule, PC
130 S. Bemiston, Suite 200
Clayton, MO 63105


W.R. England, III/Brian T. McCartney

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF # 71
Final Closure	11/08/00 at OBF # 72
Issue Category	RESOLVED

Document Name: _____

Industry Segment: _____

Part A, Page 1

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

Issue Statement/Problem: Due to the resolution statements for Issues 1548, 1667 & 1690, a different process exists for ULEC meetpoint/meetpoint-like record exchange and billing processes than facility-based LEC/CLEC/CMRS process for IXC switched access and local interconnection. This may modify the existing MECAB guidelines.

Impact on Other Issues or Procedures:

Desired Results: With the resolution of Issues 1548, 1667 & 1690, the desire is to maintain a consistent process for meetpoint/meetpoint-like record exchange & billing processes for facility based LEC/CLEC/CMRS. The process needs to be reflected in the MECAB and other applicable Industry documents. This includes IXC switched access and local/IntraLATA toll interconnection processes.

Committee Assignment: Billing Committee

Associated Committee:

Issue Champion(s):

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF # 71
Final Closure	11/08/00 at OBF # 72
Issue Category	RESOLVED

Document Name: _____

Industry Segment: _____

Part A, Page 2

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

Company Name: Jill Blakeley
Address: 5700 So. Quebec St.
Telephone Number: 303-566-5830
Email: jill.blakeley@twtelecom.com

Company Name: Cathy Passler
Address: 1001 E. 101st Terrace
Telephone Number: 816-854-8075
Email: cathy.passler@mail.sprint.com

Resolution Statement:

UNE Issues 1548, 1667 & 1690 did not allow for common minutes of use. As a result, the existing process for meetpoint/meetpoint-like record exchange & billing processes for facility based LEC/CLEC/CMRS has been changed to be consistent with the UNE process by eliminating common minutes of use and the exchange of summary usage records.

Currently there is an exchange of detail (11-0X-XX EMI) and summary (11-50-XX) records between most companies for non-unbundled services. There is a need to maintain consistent methods for billing, which would eliminate the need for companies to maintain two different processes for IXC switched access, wireless, local/IntraLATA and toll interconnection services that are meet point billed.

It is recognized that many companies will have to convert their processes from creating/receiving summary usage records to detail usage records. Therefore, beginning January 1, 2001, a dual process may exist which will allow companies to continue to send summary usage records until they can change their processes. As companies convert to non-common minutes of use, coordination and negotiation may be needed between providers to allow for a smooth transition of the processes

(2056)

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF # 71
Final Closure	11/08/00 at OBF # 72
Issue Category	RESOLVED

Document Name: _____

Industry Segment: _____

Part A, Page 3

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

and reduced impact to the customers. In addition, the receiving company will no longer use the summary usage records for billing. Companies may bill from their own recordings or arrange for the receipt of detail usage records from the recording company.

The EMI document is being updated to remove the 11-50-01 through 04 and 11-50-21 through 24 summary usage records effective August 31, 2002. Companies are discouraged from implementing new process for utilizing these record types with the resolution of this issue.

The MECAB document has been updated to incorporate these changes which will be released in Issue 7.

This issue should be referred to the CABS BOS TRG per issue 190 and to SECAB per issue 788.

Ordering and Billing Forum Issue Identification Form

OBF Issue Number		2056
Date Submitted 11/15/99		
Date Accepted	11/16/99	at OBF # 68
Initial Closure	09/21/00	at OBF #71
Final Closure	11/08/00	at OBF #72
Issue Category		RESOLVED

Part B, Page 1
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999

The Committee addressed this issue on enhancing the meetpoint/meetpoint-like record exchange to be consistent with unbundled processes for facility-based LECs/CLECs and CMRS.

Issue Champion, Jill Blakeley of Time Warner Telecom, explained due to the resolution statements for Issues 1548, 1667 & 1690, a different process exists for ULEC meetpoint/meetpoint-like record exchange and billing process than facility-based LEC/CLEC/CMRS processes for IXC switched access and local interconnection. Issues 1548, 1667 & 1690, are developing new message exchange processes for unbundled services, this issue would develop a consistent process to be used with facility based services. the desire is to maintain a consistent process for meetpoint/meetpoint-like record exchange & billing processes for all types of services that are billed by multiple providers regardless of facility based or ULEC. Ms. Blakeley advised the group that the process needs to be reflected in MECAB and other applicable Industry documents. The group went through the new issue acceptance criteria. It was agreed that the issue was a customer/ provider issue and was national in scope. However, there was some discussion whether a solution currently exists for this issue. Some participants felt as though a process was already in place and working today. Other participants felt as though the process in place today was not working or could be improved.

Ms. Blakeley explained that this issue is requesting slight changes to the existing processes today. Currently there is an exchange of detail and summary records between companies. The changed process proposed for ULECs would eliminate the summary record exchange. There are issues today that when the category 11-50-XX records are not returned, a loss of revenue is created. In addition, the elimination of the 11-50-XX could be a cost saving for some companies.

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 2
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

A concern was expressed regarding smaller companies that would be forced to change the processes that had been established and if this could really be implemented nation wide. It was explained that companies felt that the existing process and new process would both be in place for an interim time frame. This dual process would allow for smaller companies to continue to send the 11-50-XX until they could change their processes. The receiving company would no longer have to use the 11-50-XX for billing. This would hopefully minimize the impact to smaller companies.

The primary point of the issue is to provide consistency for record exchange regardless of the type of service. The process was already being implemented for ULEC service, which would require companies to maintain two different processes. With this issue being implemented, it would reduce processes down to one.

After discussion, the Committee reviewed the new issue acceptance criteria again and agreed that a consistent solution did not exist today, therefore a solution did not exist. This issue was then accepted.

Although it was expressed that the intent was to refer this issue to MECAB to be worked, Ms. Spocogee wanted to ensure that the full committee realized the impacts of the issue would cause on both customers and providers performing the processes. As a result, diagrams were created in order to clarify the impact of this issue with the participants before referring to the MECAB Group.

Questions were asked and as a result, the following diagrams were developed displaying the impacts of the changes being requested.

Ordering and Billing Forum Issue Identification Form

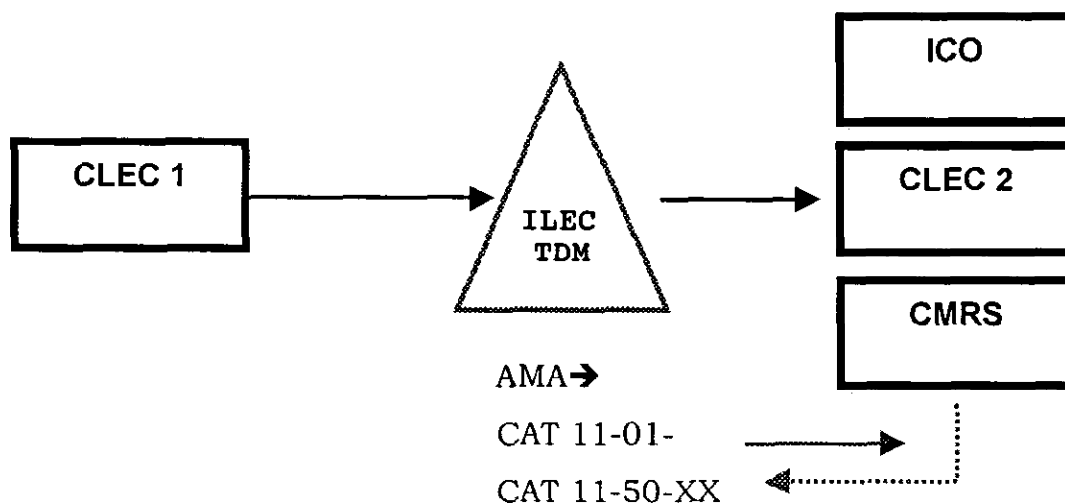
OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 3
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

Local Meet Point Billing



Today's Meet Point

- * ICO/CLEC 2/CMRS is the IBC
- * ILEC is the SBC

Bill to CLEC 1

- * ICO would bill Local Switching
- * ILEC would bill Tandem Switching
- * ICO & ILEC would bill % Transport

OBF #68, November 15-18, 1999 (Continued)

(2056)

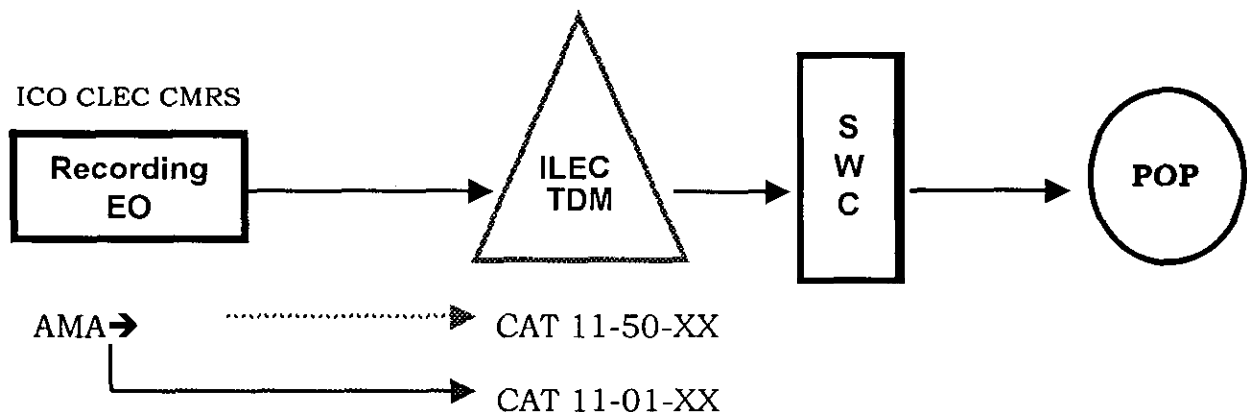
Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 4
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

Originating Call to IXC



Impacts:

- Same for single or Multiple Bill
- Bill display changes
- ILEC change to receive 11-01 vs. 11-50
- End office change to generate and transmit Cat 11-01 vs. 11-50
- Timelines of billing by ILEC may be decreased
(Don't have to wait until EO company bills to receive 11-50-XX, transmission of 11-01-XX could be immediate)
- Customers would no longer receive billing with Common Minutes of Use

Ordering and Billing Forum Issue Identification Form

OBF Issue Number		2056
Date Submitted 11/15/99		
Date Accepted	11/16/99	at OBF # 68
Initial Closure	09/21/00	at OBF #71
Final Closure	11/08/00	at OBF #72
Issue Category		RESOLVED

Part B, Page 5
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

- Detail Record and Summary Record – increase volume of record transmitted and received
- Jurisdiction Factors will need to be determined by ILEC which is not necessary in existing process (11-50-XX record contains jurisdiction information)

Ordering and Billing Forum Issue Identification Form

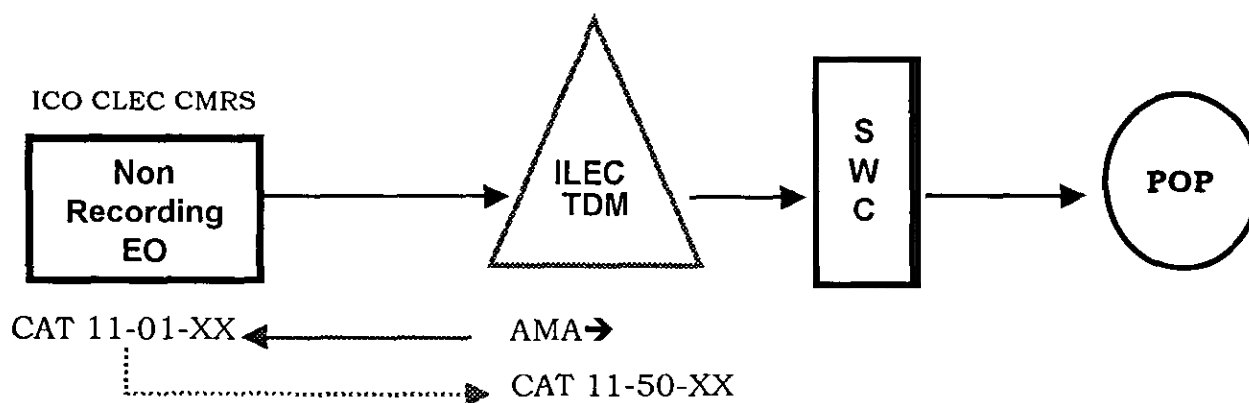
OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 6
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

Originating Call to IXC



Impacts:

- Same impacts as the Recording End Office (previous diagram), except if the tandem/recording office can bill from cat. 110XXX at the same time they send (110XXX) to the Non Recording End Office Company. This will enhance the timeliness of billing.

Ordering and Billing Forum Issue Identification Form

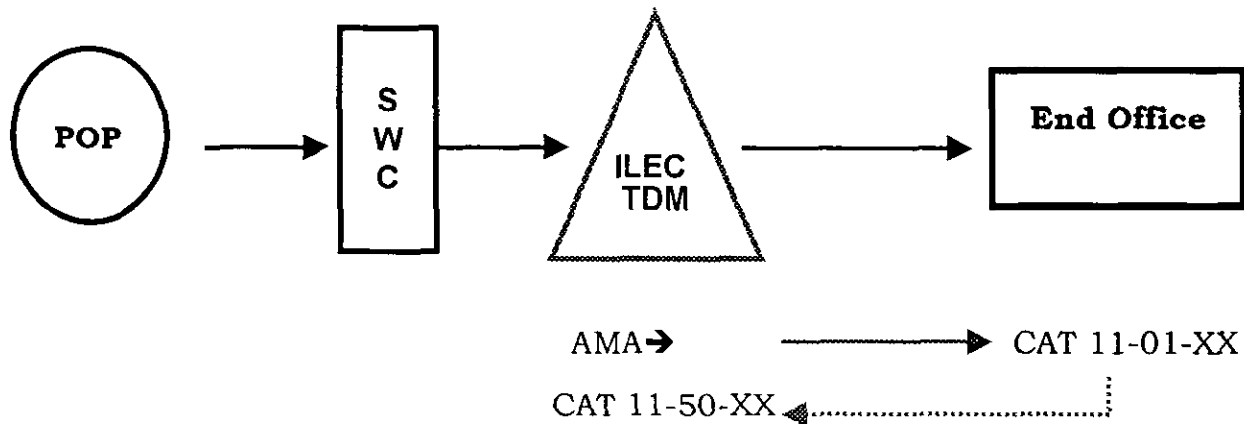
OBF Issue Number	2056	
Date Submitted	11/15/99	
Date Accepted	11/16/99	at OBF # 68
Initial Closure	09/21/00	at OBF #71
Final Closure	11/08/00	at OBF #72
Issue Category	RESOLVED	

Part B, Page 7
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

Terminating Call from IXC



Impacts:

- The tandem company should transmit the 11-01-XX to the End Office company. With the new proposal, the 11-50-XX would be eliminated and billing would be performed from the 11-01-XX.
- Bill Display changes
- Some impacts for single or multiple bill

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 8
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

Terminating

- Eliminate Common Minutes of Use
- ICO eliminates generating and transmitting of Cat. 1150XX
- Timely billing for TDM Company which benefits to customer/provider
- Could delay billing for end office since revenue incentive for billing record exchange is removed
- Terminating end office cannot measure

It was brought up that the details of how the record exchange would work would be performed in the MECAB group, but any participant was welcome to join in the meetings to assist in the development of the process. It was also explained that although processes were being developed for ULEC records, they have not gone to final yet and could be changed.

Mr. Hines suggested referring this issue to MECAB and any participant with concerns could join the MECAB group.

It was questioned if the intent was to change existing processes developed as a result of state directives or contractual agreements? It was advised that MECAB doesn't control state directives or contractual agreements today, so nothing would change, unless the contract referred to specific MECAB guidelines.

A participant advised that today there may not be record exchange between local or Intra-LATA usage. Was the intent to change this? It was explained that if record exchange was not required today, then this process would not change.

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 9
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #68, November 15-18, 1999 (Continued)

It was also questioned if the existing category 92 record process would be changed. However, it was stated that Category 92 records are not addressed in this forum but is a state/company driven process that would not be changed by this issue.

During the discussion it was brought up that different items such as bill displays, jurisdiction, timeliness of billing, etc., could be effected, but would be worked on by the MECAB committee or possibly result in the opening of new issues to be worked in full committee.

Ms. Spocogee emphasized the need for all participants to take these issues back to their own companies and cover the impacts the changes will make to their company processes. In addition, she reminded the committee of the MECAB meeting that will be held in January and they should all attend in order to understand and cover the changes being agreed to.

It was agreed to refer the issue to the MECAB committee to be worked.

As a result of the new interests this issue brings to MECAB, a revised count was done for the reservation of participants in the January meeting.

This issue will remain open and worked by the MECAB Group.

ABUG 12/01/99 CONFERENCE CALL

- ♦ Ms. Blakeley advised the ABUG participants that this Issue is pending the outcome of Issue 1932/BLG. Issue needs to be consistent with Issue 1932/BLG resolution.

Ordering and Bidding Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 10
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #69, February 7-11, 2000

It was agreed to refer the issue to the MECAB Sub-Committee to be worked.

This issue will remain open and worked by the MECAB Group.

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 11
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #70, MAY 22-25, 2000

This issue was referred to the MECAB Sub-Committee to be worked.

Due to time restraints, MECAB has not yet addressed this issue.

This issue will remain open and worked by the MECAB Group.

OBF #71, AUGUST 21-24, 2000

This issue was referred to the MECAB Sub-Committee to be worked.

This issue will remain open and be worked by the MECAB Sub-Committee.

BILLING INTERIM MEETING, SEPTEMBER 18-21, 2000

Ms. Feicht presented and reviewed a proposed resolution statement to the committee. Several suggested modifications were made to the proposed resolution for clarity and for forwarding to the CABS BOS TRG and SECAB Review Group. (See Part A, Page 2 of this issue for the resolution).

Consensus was reached to accept the resolution and place the issue into initial closure.

Ordering and Bidding Forum Issue Identification Form

OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 12
(Status History)

Issue Title: For facility-based LECs/CLECs and CMRS, enhance the Meetpoint/Meetpoint-like record exchange to be consistent with Unbundled processes.

OBF #72 (NOVEMBER 6-9, 2000)

Mr. Reeves read the Issue Statement as well as the desired results of this issue. After review of the same, Mr. Reeves continued by reviewing the Resolution Statement.

After review of the resolution statement and a minor clarification change, which did not impact the intent of the issue, consensus was reached to put this issue into FINAL CLOSURE.