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Missouri Public
Service Commission

Exhibit No.: _____
Issue: Network Business Relationships
Witness: Robert C. Schoonmaker
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Small Telephone Company Group
Case No.: TO-99-593
Date: January 11, 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

AFFIDAVIT OF ROBERT C. SCHOONMAKER

Robert C. Schoonmaker, of lawful age, being duly sworn, deposes and states as follows:

1. My name is Robert C. Schoonmaker. I am employed by GVNW Consulting, Inc. as a Vice President.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony with accompanying schedules.
3. I hereby affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief and that the information contained in the attached schedules is also true and correct to the best of my knowledge and belief.

Robert C. Schoonmaker
Robert C. Schoonmaker

Subscribed and sworn to before me this 11th day of January, 2001.

Doris K. Adams Notary Public

My Commission expires: _____

DORIS K. ADAMS
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
COUNTY OF COLE
My Commission Expires May 20, 2002

1 SURREBUTTAL TESTIMONY OF ROBERT C. SCHOONMAKER

2
3 Q. Would you please state your name and address?

4 A. My name is Robert C. Schoonmaker. My business address is 2270 La Montana
5 Way, Colorado Springs, Colorado 80918.

6
7 Q. By whom are you employed and in what capacity?

8 A. I am a Vice President of GVNW Consulting, Inc., a consulting firm specializing
9 in working with small telephone companies.

10
11 Q. Are you the same Robert C. Schoonmaker who filed direct and rebuttal testimony
12 in this case?

13 A. Yes, I am.

14
15 Q. What is the purpose of your surrebuttal testimony?

16 A. I will respond to the testimony of several witnesses in regard to a wide variety of
17 issues raised in the rebuttal testimony. These issues will include, but are not
18 necessarily limited to: incentives for providing correct records under the
19 alternative proposals; data needed for providing appropriate billing under the
20 STCG proposal; the accuracy of records recording at terminating locations; the
21 “success” of the current system; and an update on the test results based on data
22 received since the direct testimony was filed.

23
24 INCENTIVES FOR PROVIDING APPROPRIATE RECORDS

1 Q. On Page 8 of his testimony, Sprint witness Cowdery criticizes the small company
2 proposal because the small companies would not have incentives to find any
3 missing messages. How do you respond to this criticism?

4 A. There are several pieces to Mr. Cowdery's criticism. Let me address them
5 individually. First, he is critical because we have proposed that intrastate
6 intraLATA rates would be used to bill for the missing minutes and suggests that
7 these were chosen because they were the highest rates. In fact, the reason those
8 rates were chosen is that the vast majority of the traffic that is anticipated to travel
9 over these trunks is intrastate intraLATA traffic originating from the PTCs.

10 Second, he criticizes the proposal because the small companies would have no
11 incentive to find missing wireless records. Since under the current method and
12 under our proposal these records are likely to be based on originating records, we
13 have no capability of finding the missing records. Our proposal gives the tandem
14 company owners who are supposed to supply these records the financial incentive
15 to do so since they will be paying if the records are missing.

16 Mr. Cowdery criticizes our proposal because the small companies will have no
17 incentive to find the unidentified minutes. However, the tandem companies who
18 have control of those records will have the incentive to find those records so they
19 will not have to pay for unidentified minutes. What Mr. Cowdery fails to
20 recognize is that the plan proposed by the PTCs gives those companies no
21 incentives to create correct records and send them to the small companies because
22 they have no financial benefit by doing so, and in some cases may have to pay
23 more if they send the records to the small companies.

1 From the standpoint of financial incentives, the small company plan gives
2 incentives to those who are recording various types of traffic that are billed to
3 other parties under the plan to make sure those recordings are correct so the
4 correct party will be billed.

5
6 QUALITY OF TERMINATING RECORDS
7

8 Q. Verizon witness Allison implies on both pages 2 and 3 of her testimony that the
9 recordings made by the small companies may have not been accurate because
10 trunk holding times were measured rather than conversation minutes. Is this
11 criticism valid?

12 A. No, it is not. The small companies are aware of the difference between trunk
13 holding times and conversation times and used conversation times in their
14 recordings. This is evidenced by the large number of originating records where
15 matches were achieved and the conversation time differences are minimal.
16 Attached as Schedule RCS-9(HC) is a copy of the matched records for the test
17 hour on July 17 for Peace Valley telephone company whose terminating traffic
18 primarily originates with Verizon. During that hour 78 calls with conversation
19 times ranging from 4 seconds to 5080 seconds were recorded with the variation in
20 conversation time between the originating and terminating minutes varying
21 between 0 and 2 seconds.
22

1 Q. On Page 2 of her testimony Verizon witness Allison states that "...many of those
2 unmatched records were unanswered calls that should not have been recorded..."

3 What is your reaction to this statement?

4 A. In its analysis provided to GVNW, Verizon identified five calls to Peace Valley
5 which Peace Valley recorded with conversation times ranging from 21 to 57
6 seconds for which Verizon indicated they recorded no conversation time. No
7 explanation has been identified as to why Verizon recorded no conversation time
8 while Peace Valley recorded such time. These five records were 5 out of a total
9 of 35 unmatched terminating recordings during the test hour. Four of these calls
10 originated from the West Plains exchange and one from the Summerville
11 exchange. Schedule RCS-10(HC) is the detailed printout of the unmatched
12 terminating calls for Peace Valley for that hour.

13
14 Q. Ms. Allison also criticizes the terminating records as being inappropriate for use
15 because they "...do not contain sufficient detail for billing purposes" (Page 3,
16 Line 8), and specifically states that the terminating records did not always contain
17 the originating number. Can you respond both to the specific and general
18 criticisms?

19 A. Yes, as can be seen from Schedule RCS-9(HC) the terminating records do not
20 always contain the originating number, but neither do the originating records. An
21 examination of this schedule will show, though, that the terminating company is
22 recording more originating numbers than did the originating company, Verizon.
23 While having the originating number may be useful for identifying the

1 jurisdiction of the call, it is not essential since jurisdiction of IXC calls are
2 primarily determined by Percent Interstate Use (PIU) factors supplied by the
3 individual carriers.

4 As I indicated in my earlier testimony, under the business plan proposed by the
5 small companies, it is unnecessary to identify the originating carrier. The
6 terminating carrier, under the plan, is identified by the trunk group over which the
7 call is carried, a function that can be recorded at the terminating company.

8
9 Q. Verizon witness Allison states that "...the network test clearly demonstrated that
10 there are no problems with Verizon Midwest's recording and/or record exchange
11 process." (Page 3, Lines 6-7) Do you agree with this statement?

12 A. No, I do not. If one examines Schedules RCS-3 and RCS-4 provided with my
13 direct testimony, one will see that Peace Valley, who subtends a Verizon tandem
14 switch has one of the lower levels of terminating calls matched, around the 70%
15 range. If one reviews Schedule RCS-10(HC), of the 35 calls identified, 13 of
16 those calls have recorded originating numbers. Of those 13 calls, one originates
17 from a SWBT exchange, ten originate from Verizon exchanges, and 2 originate
18 from out of state and would appear to be IXC calls. If one reviews Schedule
19 RCS-9(HC) and compares the calls with no originating number in the terminating
20 recording, almost all these calls are call type 2, which are IXC calls. One can
21 reasonably surmise that the 22 calls on RCS-10(HC) that have no originating
22 number are similarly IXC calls for which Verizon did not provide an originating
23 recording.

1

2 UPDATE OF TERMINATING TEST RESULTS

3

4 Q. In your direct testimony you presented Schedules RCS-3 and RCS-4 which
5 showed initial summary results of the network test and the differences between
6 the terminating and originating messages. Have you updated those schedules to
7 account for additional information that has been received subsequent to the initial
8 results being provided to the PTCs?

9 A. Yes, I have. Schedules RCS-7 and RCS-8 provided updated schedules for the full
10 test and for the one-hour test period that reflect updated information received
11 from the PTCs.

12

13 Q. Can you describe the adjustments that you made to update Schedules RCS-7 and
14 RCS-8?

15 A. Yes. Ms. Dunlap's testimony describes the Local Plus recording problems that
16 SWBT discovered after the test was conducted. While SWBT was not able to
17 provide specific records for the test period, I did make an adjustment to reflect
18 this recording problem. I obtained the list of NXX codes from SWBT that
19 identified each of the NXX codes where the Local Plus recording problem
20 existed. This list is contained in Schedule RCS-11. For each of the companies
21 participating in the network test we went through the unmatched terminating
22 records and counted the number of records for the total period and for the one-
23 hour test period that showed originating numbers with these NPA-NXX codes and

1 assumed that all of these calls were Local Plus calls that were not recorded
2 properly. These calls were added to the originating record counts and the
3 matched record counts for the companies.

4 Ms. Dunlap also describes in her testimony the Northeast Missouri Telephone
5 Company calls that were not initially extracted for the test. As Ms. Dunlap
6 indicated additional records for Northeast were sent to GVNW. Although the
7 conversation time data was not correctly supplied in these records, we were able
8 to add these additional records to the totals for Northeast Missouri.

9 Mr. Cowdery, in his testimony, indicates that Sprint found additional records
10 which were transmitted to GVNW related to Rock Port Telephone Company.
11 Rock Port has been reprocessed with these additional records included.

12
13 Q. Does this additional data fully resolve all the terminating recording issues in your
14 mind?

15 A. No. While these identified differences certainly improve the results from the
16 initial test results, there are two companies with greater than 20% of their
17 terminating records unmatched and five companies with greater than 10% of their
18 terminating records unmatched. Three others have differences less than 10%, but
19 still above acceptable levels. As I indicated in my rebuttal testimony, the
20 experience from the network test, and the results, continue to demonstrate the
21 need for changing the current business relationship to give the parties creating the
22 originating records a real incentive to improve their record creation processes.

1 Q. Do you have any comments on any of the lessons that have been learned through
2 the network test?

3 A. One thought that keeps coming back to me is the effectiveness of having data
4 available at the individual call level detail so that specific issues can be identified
5 and traced. While overall volume comparisons can give an indication of the
6 overall extent of the problem only individual call level detail can provide the
7 ability to track and identify problems resulting from individual exchanges,
8 carriers, or switches. Under the current record exchange systems, records for IXC
9 traffic and PTC traffic are exchanged at a call detail level. However, records for
10 wireless carriers and FGA are only exchanged in summary form. If all records
11 were exchanged in call level detail including originating NPA-NXX information,
12 ongoing tests could be conducted by individual companies to identify specific
13 problems.

14
15 "SUCCESS" OF THE CURRENT SYSTEM
16

17 Q. Do you agree with SWBT witness Dunlap's assessment that the problems that the
18 small companies have identified do not "...justify dismantling a system that has
19 been successfully used for over twelve years?" (Page 7, Lines 8-9)

20 A. No, I do not. I recognize that the Local Plus recording problems are largely the
21 result of human errors. But there are also problems with the system when it does
22 not identify human errors of this magnitude. The Local Plus billing problem
23 clearly demonstrates a major system flaw. A human error was made that had very

1 large impacts, but the system had no internal capability to identify the problem.
2 The problem was identified and highlighted by Mid-Missouri and the system
3 couldn't identify what was happening. Mid-Missouri then threatened to shut off
4 service and SWBT brought the issue to the Commission, but the system still was
5 unable to identify what and where the problem was. Only because of the
6 fortunate happenstance that a network test was conducted led to the discovery of
7 this major problem. In my mind, that demonstrates that the system is faulty.
8 This issue has been discussed and brought before this Commission in several
9 different proceedings and still a resolution hasn't been reached. Some problems
10 have been identified by the network test, but others have not. There is still a
11 significant amount of terminating traffic for which no originating records are
12 apparently being created and the small companies are not receiving compensation
13 for their unidentified traffic.
14 In addition, we still have a business relationship which is so complex that the
15 small companies, the wireless companies, and the Commission are still trying to
16 figure out how to get the wireless companies to pay for traffic they have been
17 terminating for years. Nearly a year and a half has gone by since the termination
18 of the PTC plan, yet SWBT and other LECs are still not paying for interstate
19 intraLATA traffic that they are terminating. We don't see the current system as
20 successful and won't until we are getting compensated for both the identified and
21 unidentified traffic in an administratively reasonable way.
22

1 Q. Ms. Dunlap indicates in her testimony that in each case where questions have
2 been raised with SWBT they were able to resolve the concern. Do you believe
3 that was the case?

4 A. No. SWBT has worked on these issues with various companies. In some cases
5 new information has come to light and issues have been identified. However, in
6 many of the cases answers have not been found. Citizens' has shared information
7 similar to that presented in my Schedule RCS-6 on a number of occasions. As a
8 result of those discussion there has been some closing of the gap and better
9 reconciliations, but the overall problem still remains and is unresolved. That is
10 true of other companies as well.

11
12 Q. Does the opportunity to conduct audits or reviews as described by SWBT witness
13 Dunlap give you assurance that problems still existent in the originating recording
14 systems can be identified?

15 A. No. While reviews and audits are allowed they are costly and frequently do not
16 provide the desired results or identify the problems. While I have not participated
17 in such an audit, it is my impression from discussions with participants in such
18 audits that frequently there are impediments presented which make the audit
19 process difficult. In order to address the problems that still remain in the system,
20 multiple systems of multiple carriers would have to be reviewed and addressed.
21 For example, in spite of the voluntary cooperation of all the major parties in the
22 network test, there are still a substantial number of calls for which no match has
23 been made, and no explanation has been identified.

1 OTHER ISSUES

2
3 Q. SWBT witness Dunlap criticizes our proposal for not relying on record systems
4 that we believe are unreliable. Can you respond to this criticism?

5 A. Yes. We would much rather have a system simpler than the one we proposed.
6 We would be delighted to rely solely on our terminating recording of traffic
7 terminating on the common trunk group and charging for all of the traffic to the
8 tandem company terminating the traffic. We would prefer not to rely on any of
9 the originating records that are included in our proposal. However, that proposal
10 has been tried and arguments have been made that the Commission doesn't have
11 jurisdiction over much of this traffic (eg FGA traffic, interstate intraLATA traffic,
12 and IXC traffic) and that a decision has been made about wireless traffic by this
13 Commission. Our current proposal is not ideal from our standpoint, but it was
14 fashioned to recognize some of these real concerns about jurisdiction and prior
15 precedent. The fact that we are proposing to use existing originating records, or
16 terminating records recorded at the tandem as part of our proposal should not be
17 construed that we are happy with such proposals, just realistic.

18
19 Q. On pages 5 through 7 of Verizon witness Allison's testimony she discuss the
20 Ordering and Billing Forum (OBF) Issue 2056 and states that once adopted by the
21 industry she believes it would solve the issues in this docket. Do you agree with
22 this assessment?

1 A. I do not. Subsequent to reading Ms. Allison's testimony I obtained a copy of
2 OBF Issue 2056 which is attached as Schedule RCS-12. The summary of this
3 issue contained in Part A, Page 2 appears to indicate that the primary change
4 proposed would be to eliminate the use of category 11-50-XX summary records
5 for meet point billing and to have both the end office company and tandem
6 company bill using 11-01-xx detail records instead. This does not appear to deal
7 with issues other than those that are currently using these record types. Part B,
8 Pages 3-7 contains diagrams of the various scenarios apparently addressed in the
9 issue. The only diagram dealing with terminating traffic is the one on page 7 that
10 deals with terminating IXC traffic. In Part B on the bottom of page 8 and top of
11 page 9 there is discussion of intraLATA usage and existing 92 record systems or
12 other state/company driven processes. The document specifically states that this
13 Issue does not deal with or change any of the state/company driven processes.
14 Thus, it appears to me that the Issue has little relationship to the issues contested
15 in this docket and does not deal with the bulk of them.

16
17 Q. Does this conclude your testimony?

18 A. Yes, it does.

19

Missouri Terminating Recording Test
Summary of data matches by Participating Company
(July 16-17, 2000 Test Period) Adjusted for Subsequent Records Identified

Company	Total Terminating Calls Recorded	Total Originating Records Received**	Total Matched Calls**	% of Terminating Calls Matched	# of Originating Records Matched
BPS	18,151	16,927	16,858	92.9%	99.6%
Citizens	6,167	5,982	5,867	95.1%	98.1%
Farber	1,291	1,189	1,135	87.9%	95.5%
Kingdom	7,247	7,107	5,970	82.4%	84.0%
KLM*	3,923	3,923	3,910	99.7%	99.7%
Modern	4,062	4,003	3,923	96.6%	98.0%
Northeast Missouri	4,757	4,887	4,171	87.7%	85.3%
Peace Valley	2,512	1,830	1,824	72.6%	99.7%
RockPort	16,082	10,136	9,483	59.0%	93.6%
Total	64,192	55,984	53,141	82.8%	94.9%

Match Criteria

1. Terminating Number Match
2. Connect time within 2.5 minutes
3. Conversation time within 5 seconds

Note:

*Records indicated are records from the hours in which both originating and terminating records were being recorded.

**Originating record totals revised to include: Originating records from Ericsson NXX codes, additional records received from Sprint for Rock Port, additional NEMO records.

Missouri Terminating Recording Test
Summary of data matches by Participating Company
(One Hour Test Period - 7/17/00 - 1:00 p.m. - 2:00 p.m.) Adjusted for Subsequent Records Identified

Company	Total Terminating Calls Recorded	Total Originating Records Received*	Total Matched Calls*	% of Terminating Calls Matched	# of Originating Records Matched
BPS	950	902	900	94.7%	99.8%
Citizens	259	253	251	96.9%	99.2%
Farber	68	61	61	89.7%	100.0%
Kingdom	238	232	206	86.6%	88.8%
KLM	296	295	294	99.3%	99.7%
Modern	191	186	184	96.3%	98.9%
Northeast Missouri	151	152	133	88.1%	87.5%
Peace Valley	113	79	78	69.0%	98.7%
RockPort	750	535	502	66.9%	93.8%
Total	3,016	2,695	2,609	86.5%	96.8%

Match Criteria

1. Terminating Number Match
2. Connect time within 2.5 minutes
3. Conversation time within 5 seconds

Notes:

* Adjusted to Reflect additional records received from Sprint for Rockport; Calls w/Ericsson NXX codes; additional NEMO records.

Schedule RCS-9 (HC)

HIGHLY CONFIDENTIAL

FILED UNDER SEPARATE COVER

Schedule RCS-10 (HC)

HIGHLY CONFIDENTIAL

FILED UNDER SEPARATE COVER

List of NXX Codes
Impacted by Ericsson Switch Local Plus Recording Problem

EXCHANGE	NPA	NXX	LATA
ARGYLE	573	728	520
CARDWELL	573	654	520
CAMPBELL	573	246	520
CARUTHERSVILLE	573	333	520
DERRING	573	757	520
FREEBURG	573	744	521
GIDEON	573	448	520
HAYTI	573	359	520
HOLCOMB	573	792	520
HORNERSVILE	573	737	520
KNOB NOSTER	660	563	524
	660	687	524
KENNETT	573	717	520
	573	888	520
LAMONTE	660	347	524
LINN	573	897	521
META	573	229	521
MEXICO	573	473	520
	573	581	520
	573	582	520
MALDEN	573	276	520
MARSHALL	660	831	524
	660	886	524
MONTGOMERY CITY	573	564	520
RISCO	573	396	520
SEDALIA	660	530	524
	660	826	524
	660	827	524
	660	829	524
SENATH	573	738	520
SLATER	660	529	524
VIENNA	573	422	521
WARDEL	573	628	520
WELLSVILLE	573	684	520
WESTPHALIA	573	455	521

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):

(2056)

Ordering and Billing Forum Issue Identification Form

OBF Issue Number	2056
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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.
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Company Name: Cathy Passler
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Telephone Number: 816-854-8075
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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

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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

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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.

(2056)

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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.

(2056)

Ordering and Billing Forum Issue Identification Form

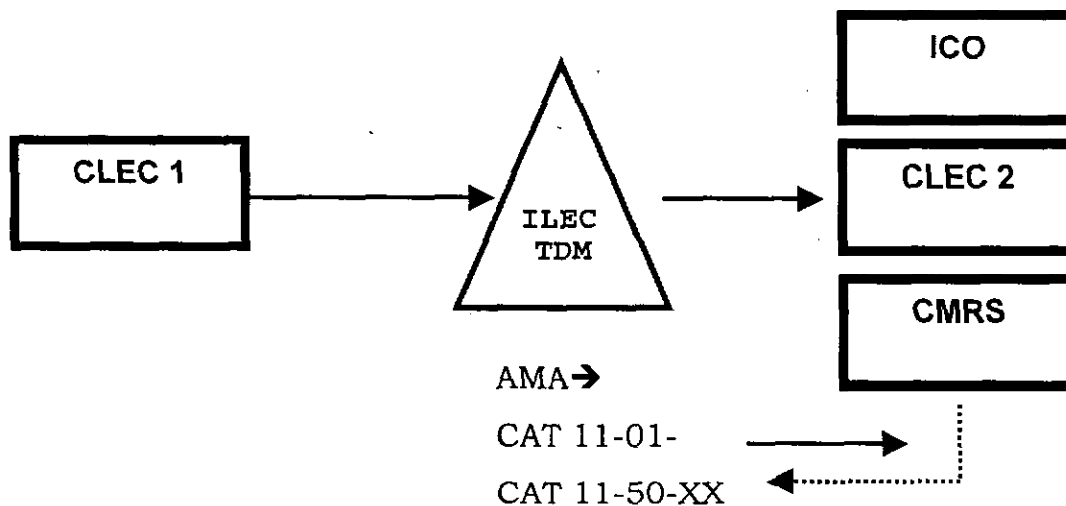
OBF Issue Number	2056
Date Submitted	11/15/99
Date Accepted	11/16/99 at OBF # 68
Initial Closure	09/21/00 at OBF #71
Final Closure	11/08/00 at OBF #72
Issue Category	RESOLVED

Part B, Page 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

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Ordering and Billing Forum Issue Identification Form

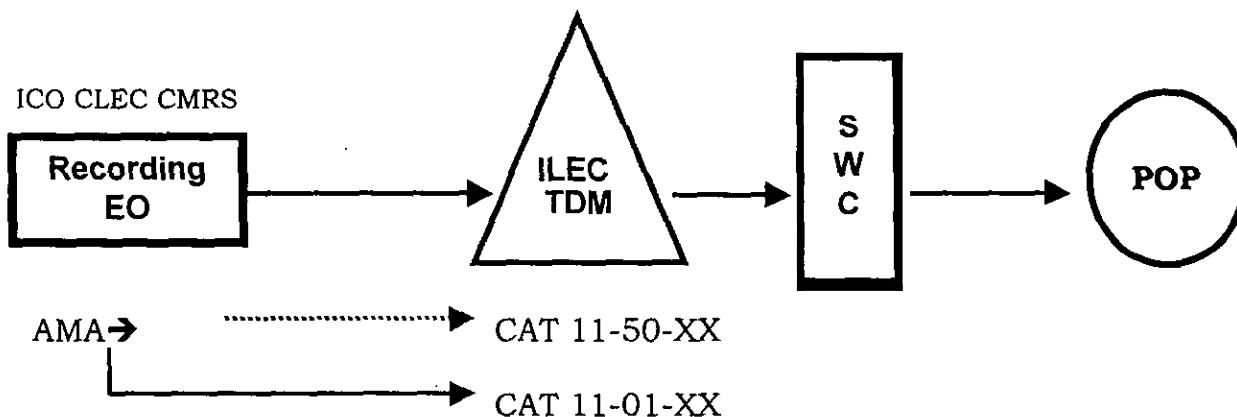
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Issue Category	RESOLVED

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.

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

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

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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)

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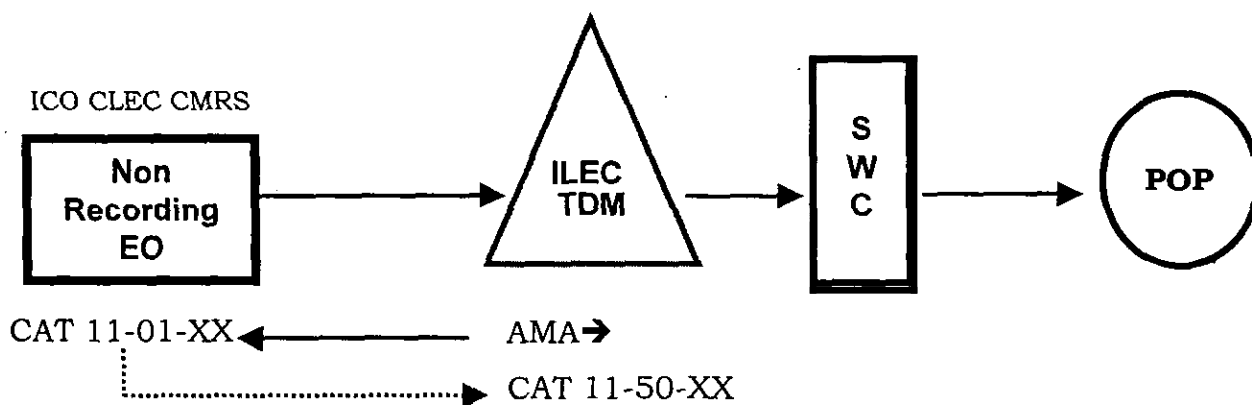
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Issue Category	RESOLVED	

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.

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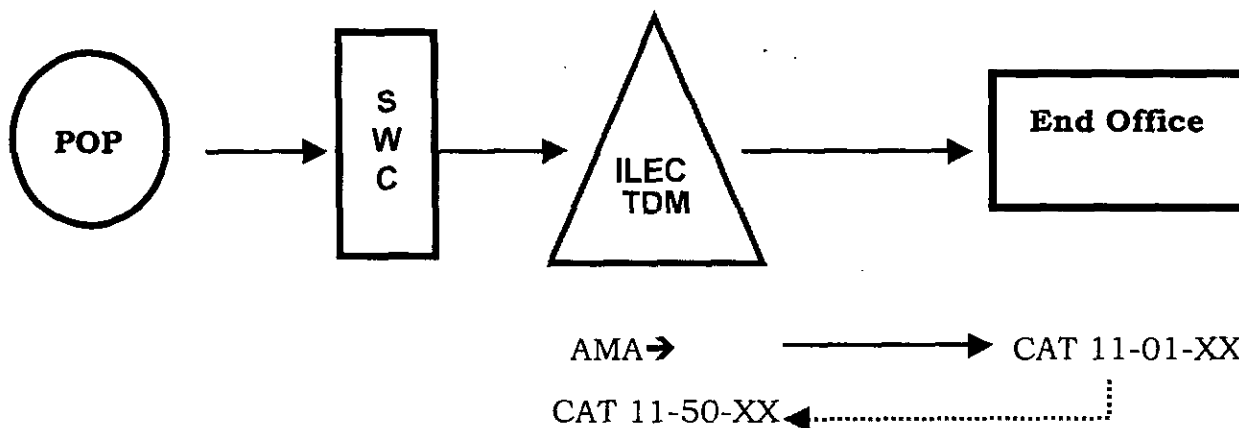
OBF Issue Number	2056	
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Final Closure	11/08/00	at OBF #72
Issue Category	RESOLVED	

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

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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.

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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.

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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.

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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.

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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.