

## **Exhibit B**

6068 000

Bell Atlantic Network Services, Inc.  
Two Bell Atlantic Plaza  
1320 N. Court House Road, 8th Fl.  
Arlington, VA 22201  
Voice: 703 974-3940  
Fax: 703 974-0665  
Internet: steven.h.hartmann@bellatlantic.com

**Steven H. Hartmann**  
Counsel



March 23, 1999

**Via Facsimile and U.S. Mail**

Glenn S. Richards  
Fisher Wayland Cooper Leader & Zaragoza L.L.P.  
Suite 400  
2001 Pennsylvania Avenue, N.W.  
Washington, DC 20006-1851

Dear Mr. Richards:

Given our recent telephone discussions about the topic, I am responding to your letter to Georgene Horton dated February 17, 1999, on behalf of the Mid-Atlantic Associations of ALECs (MAA), in which you request that Bell Atlantic (BA) provide resellers with the ability to block end-users' access to directory assistance (411).

As you correctly note in your letter, there is no product available in the BA South states that allows carrier-controlled blocking of directory assistance calls by end users. Moreover, after considering this issue, including both the economics and the competing demands on internal resources, Bell Atlantic has no plans, at least at present, to develop and implement such a product in the BA South states.

In your letter, you state that the requested blocking service is "fully consistent with" the policies of the FCC and the state commissions, but you stop short of asserting that BA has any legal obligation to create this service, and I am aware of no such obligation. If you believe otherwise, please indicate the basis for such obligation, so that we can consider the matter further.

A potential alternative is for MAA members to implement BA's Customized Routing Service for Operator Services and Directory Assistance to an alternate operator services provider. Using this service, a reseller can control all end-user access to operator and directory assistance services. The rates and charges for the BA portion of the Customized Routing Service are set forth in Bell Atlantic's various SGATs, tariffs and/or specific customer Resale Agreements. If

Glenn S. Richards  
March 23, 1999  
Page 2

the Customized Routing Service sounds like it may be a viable alternative. Georgene Horton, at 914-644-4887, can arrange a meeting to discuss it in more detail.

Feel free to give me a call if you'd like to discuss these issues further.

Sincerely,

A handwritten signature in cursive script that reads "Steven H. Hartmann". The signature is written in black ink and is positioned above the printed name.

Steven H. Hartmann

cc: G. Horton

## **Exhibit C**

NALA  
NATIONAL ALEC ASSOCIATION

August 3, 1999

Barbara Crawford  
Director-Resale Product Department  
Bell Atlantic Network Services  
125 High Street, Room 658  
Boston, MA 02110

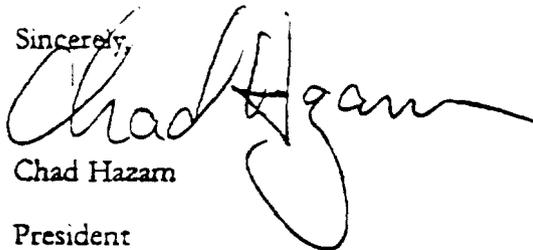
Dear Barbara:

I am in receipt of your letter of July 29, 1999 concerning the requested call blocking services. As an initial matter, you are correct that NALA rejected Bell Atlantic's initial proposal because of the large up front payment and the restricted availability of the offering. As you aware, however, you rejected our counterproposal for service that is generally available, (non privatized) without any up-front payment and a reasonable, recurring monthly line charge would which would permit Bell Atlantic to recover any costs it incurs in the development and implementation of the blocking service.

Our proposal remains on the table and we welcome the opportunity to continue our discussions. Many NALA members believe, however, that we must file our complaint with the Pennsylvania PUC to keep Bell Atlantic negotiating in good faith. Notwithstanding, I am willing to hold off filing the complaint if Bell Atlantic is willing to make an offer that is in line with the NALA counterproposal. Please contact me as soon as possible if there is any change in Bell Atlantic's position.

I look forward to your response.

Sincerely,



Chad Hazam

President

CC: NALA Members

Glen Richards-Fisher Wayland

Bell Atlantic Network Services  
125 High Street  
Room 638  
Boston, MA 02110  
617 743-2040 Fax 617 342-9505

Barbara A. Crawford  
Director - Resale Product Development  
Telecom Industry Services



July 29, 1999

CHAD Hazam  
NALA

Dear Chad,

I was very disappointed to hear of NALA's rejection of Bell Atlantic's offer to provide the requested call blocking services discussed in concept at our June 22, 1999 meeting. The harmonious atmosphere of the meeting conveyed the indication that Bell Atlantic was on target with both the service description concepts and implementation.

As you know, Bell Atlantic is under no legal obligation to provide the requested call blocking services. However, as a result of your positive reaction in our meeting, we were looking forward to getting back together with you to further discuss the details of how Bell Atlantic would be able to meet your needs in a mutually agreeable manner. It is quite unfortunate that NALA has chosen to turn away from negotiation and feels it has to move to litigation to obtain services that Bell Atlantic has already agreed in principle to provide.

In any event, Chad, I want you to know that Bell Atlantic stands ready to resume discussions with NALA regarding this issue, at any time that is mutually agreeable to the participants.

Sincerely

Barbara Crawford

A handwritten signature in black ink, appearing to read 'Barbara A. Crawford'.

cc: Jonathan Smith  
Georgene Horton  
Julius Bradley  
Jeffrey Boichot  
Marcel Bryar  
Joyce Spencer  
Julia Conover

## **Exhibit D**

FISHER WAYLAND COOPER LEADER & ZARAGOZA L.L.P.

2001 PENNSYLVANIA AVENUE, N.W.

SUITE 400

WASHINGTON, D. C. 20006-1851

TELEPHONE (202) 659-3494

J AQUALIN FRIEND PETERSON

(202) 775-3534

FACSIMILE

(202) 296-6518

INTERNET

jpeterson@fwciz.com

September 17, 1998

**Via Facsimile (703) 974-2183**

Mr. Michael Daly  
Bell Atlantic  
1320 North Courthouse Road  
Second Floor  
Arlington, VA 22201

**Re: Metro Market Toll Restriction Proposal**

Dear Mr. Daly:

On June 25, 1998, our client, Mid-Atlantic Associations of ALECs ("MAA"), submitted a proposal to Bell Atlantic for the development of a toll restriction product, which could be purchased for resale by alternate local exchange carriers ("ALECs") to restrict customer access to certain metro market calling areas within the cities of Philadelphia and Pittsburgh (hereinafter "the Proposal"). We understand the same problem exists in Boston. A copy of the Proposal is attached hereto. Despite MAA's representation in the Proposal that member ALECs would purchase the product, if made available to them at a reasonable cost, and persuasive evidence that the product is technically feasible, easy to employ and would be profitable to Bell Atlantic, MAA has yet to receive Bell Atlantic's response to the Proposal.

MAA believes that the Proposal is mutually beneficial and that it is in the best interests of both parties to work together to develop a satisfactory product. MAA also believes that this product is in the public interest because it promotes the goals of universal service by increasing customer access to reasonably priced local telephone service. For these reasons, MAA is willing to engage in a dialogue with Bell Atlantic and to provide it with relevant customer and/or market data. More importantly, member ALECs are willing to negotiate reasonable compensation, on a per line basis, for the product once it is developed by Bell Atlantic.

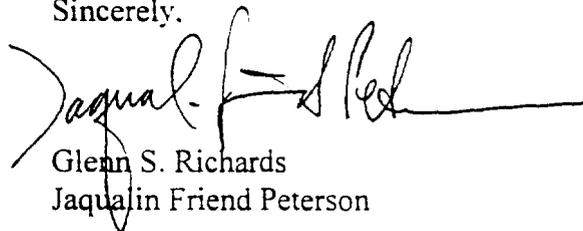
Notwithstanding the foregoing, MAA will take whatever action is necessary to ensure implementation of this product. The unavailability of such product is a significant barrier to our ability to provide service to our customers in Pennsylvania and Massachusetts, given that Philadelphia, Pittsburgh and Boston are the largest metropolitan areas in these states. Low-income individuals are particularly disadvantaged by the absence of this service because of the

Mr. Michael Daly  
September 17, 1998  
Page 2

cost that is incurred to purchase service throughout an entire metro market. MAA notes that metro market toll restriction products are available in other major metropolitan cities throughout the country, including Houston, Dallas and Atlanta. Moreover, MAA has reason to believe that Bell Atlantic offers such a product in its own region in Baltimore and the District of Columbia, and that Bell Atlantic has been able to restrict access to metro market calling in Philadelphia, Pittsburgh and Boston, on an as needed basis, to deal with its own customers who have incurred significant toll charges which are unpaid. Pursuant to Section 251(c)(4) of the Telecommunications Act of 1996, 47 U.S.C. § 251(c) (4), incumbent local exchange carriers must offer for resale "any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers." Accordingly, if Bell Atlantic provides the aforementioned service to its retail customers, it must also offer the same service to MAA's member ALECs.

While MAA would prefer to work with Bell Atlantic to develop this product, we will take whatever action is necessary to resolve this problem. Accordingly, we request your immediate attention to this matter and a response to the Proposal by October 1, 1998.

Sincerely,

A handwritten signature in black ink, appearing to read "Jaquelin Friend Peterson", with a long horizontal line extending to the right.

Glenn S. Richards  
Jaquelin Friend Peterson

Counsel for Mid-Atlantic Associations of ALECs

Enclosure

cc: Chad Hazam

J:\DATA\CLIENT\60\6068\DAILEY.001

## **Exhibit E**

## Mid-Atlantic Associations of ALECs

525 s. 29<sup>th</sup> Street  
Harrisburg, PA 17104  
(717) 564-0603  
(717) 564-9429

June 25, 1998

Barbara Crawford – Director of Resale Product Development  
Georgine Horton - Account Manager  
Mike Daly – Head of CLEC Negotiations & Regulatory Compliance  
Bell Atlantic

Re: Metro Market proposal for Philadelphia & Pittsburgh areas.

Dear Barb, Georgine, & Mike.

We believe that we, as a group, can generate tens of thousands of lines of business for both Bell Atlantic and ourselves in these two cities over the next two years. Bell Atlantic would need to toll restrict the customer from calling between metro markets (within a city) when we toll restrict the customer from placing collect and long distance calls. We believe from conversations with past Bell customers that Bell indeed has this ability and has done this with customers who have had severe credit problems with Bell in these cities. If Bell does this for it's own problem customers, we would like to be able to request this service for our customers.

Currently, to effectively block our customers from incurring a toll, we must purchase and resell the entire metro market area in these two cities. This can more than double our costs. In some cases it triples our cost. By the time we try and turn a profit through our mark up we have priced the service out of the reach of our target customer. Our customer, in general, is the customer Bell has disconnected and no longer services. We charge \$39.95 for a service that you charge only \$14.00. We offer Bell a way to make money on these customers once again without the risk and hassle of non-payment. We can increase Bell's lines by well over 100,000 customers and Bell will only send a handful of bills.

After contacting each member of our group, I have put together what each member believes he will do in these towns if the Metro Market problem can be successfully overcome. I have done this in graph form. I also have shown a total of all members together. I must point out that these customers not only purchase local unlimited calling, but also two or more options each. This represents approximately \$20.00 of revenue to Bell, per customer we sign up. By signing up 50,000 customers we will generate \$1,000,000.00 of additional revenue for Bell Atlantic per month. That's 12million dollars per year.

These numbers are realistic based on what has been done in other states with Southwestern Bell and Bell South Companies over the past 1 1/2 years. At \$20.00 of revenue per customer to Bell (excluding connection fee) Bell could stand to earn up to 3.5 million dollars of additional revenue per month. That is 42 million per year plus a \$40.00 connection fee on 176,000 customers. Bell would also earn restoral fees at a high frequency on the credit-challenged customers we target. Other services such as change of telephone numbers and change of address are very frequent among our customers. These four items together might total as much as an additional \$8,000,000.00 per year into Bell's pockets. Can Bell afford to ignore this type of revenue? I hope not. These figures are based on 5 companies. I'm sure that other ALECs who have recently called me will plan to enter the market once the Metro Market problem is cleared away.

In conclusion, we see Bell and ourselves as business associates who can mutually benefit each other. We believe we can be a win win combination. We are willing to work with Bell and it's associates to make this goal a reality.

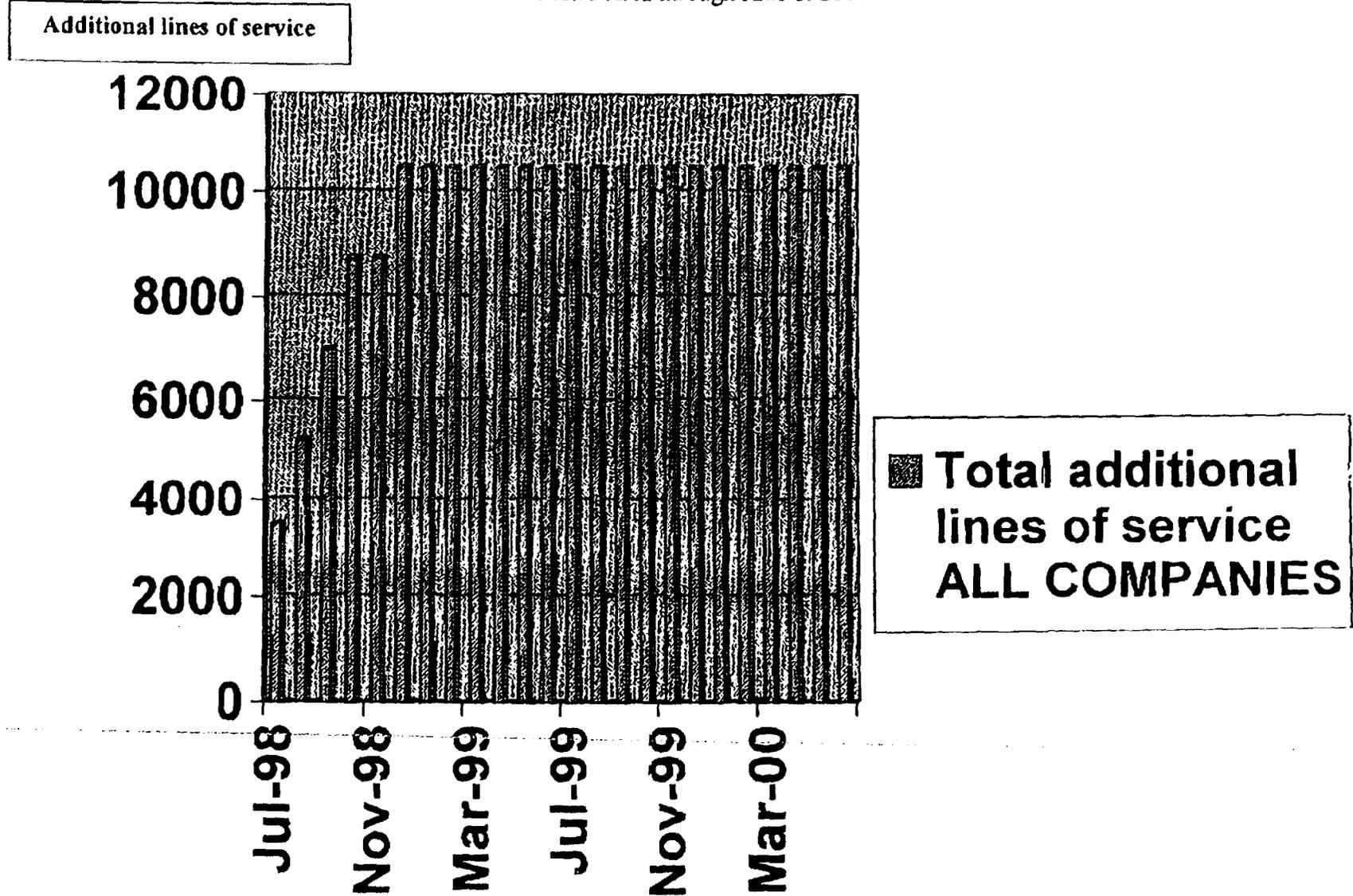
Sincerely,

Chad Hazam  
President MAA

CHaf

MAA

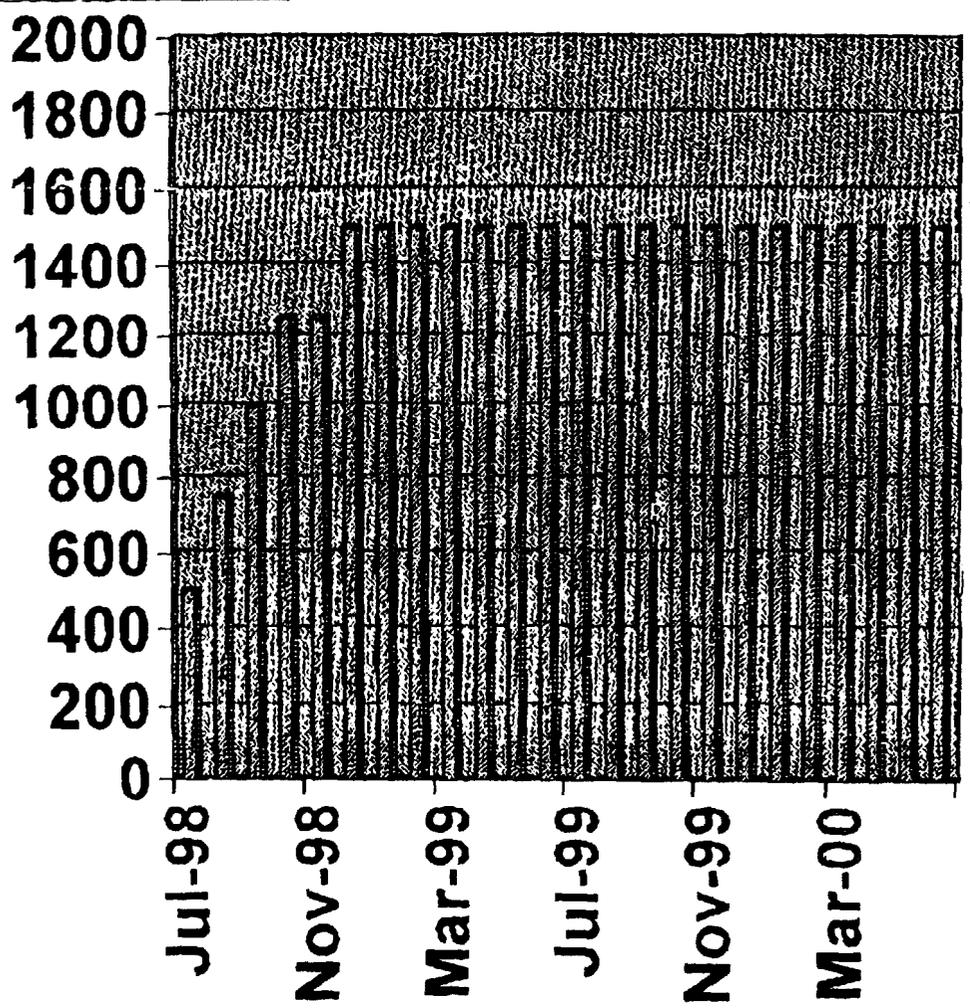
Additional business conducted in Philadelphia & Pittsburgh  
Metro Area through June of 2000



Total after year 1 – 85,750  
Total after year 2 – 176,750

**1<sup>st</sup> LINE COMMUNICATIONS**  
 Additional business conducted in Philadelphia & Pittsburgh  
 Metro Area through June of 2000

Additional lines of service



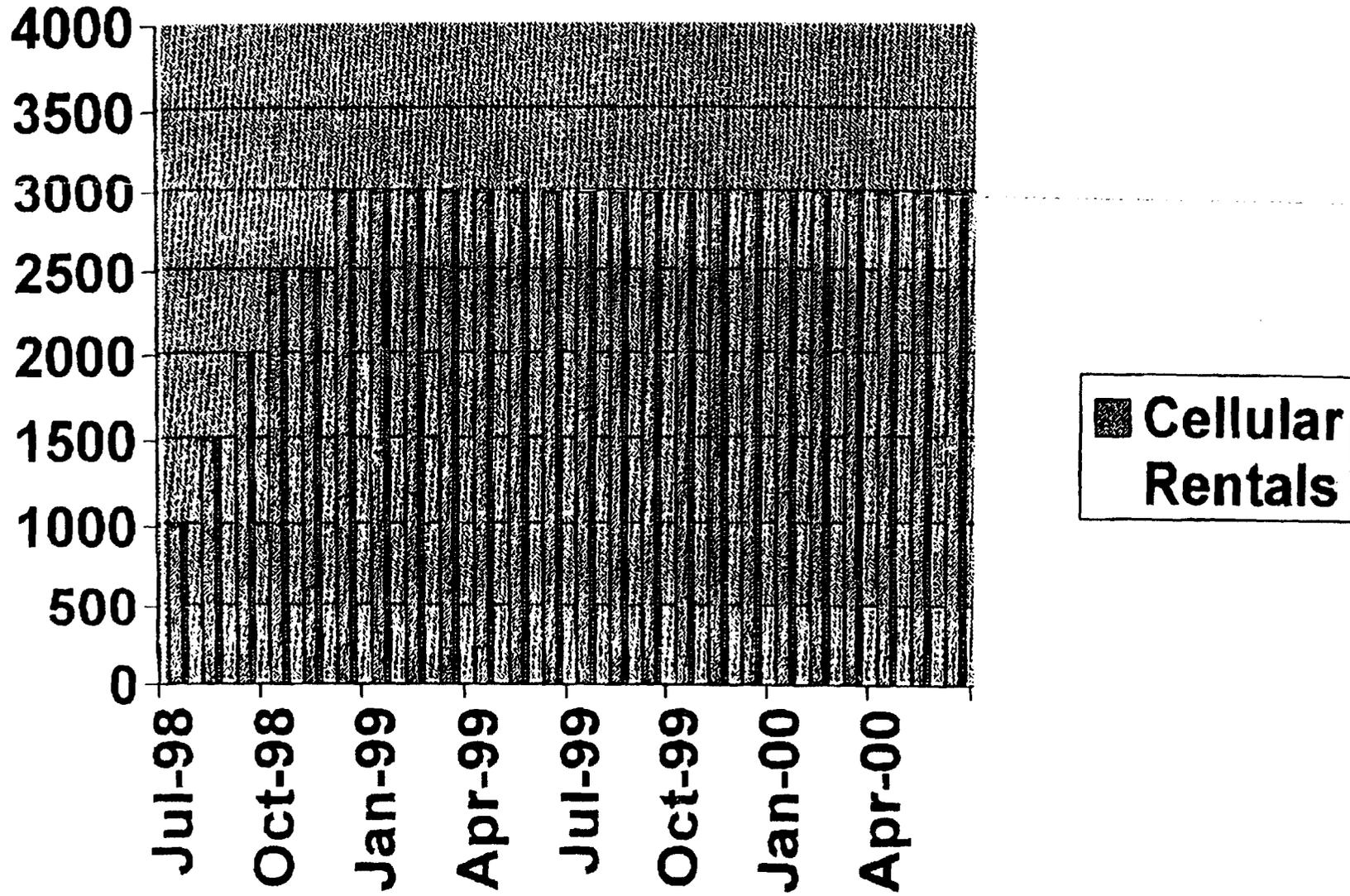
■ 1st Line  
 Communications

**Total after year 1 – 12,250 lines**  
**Total after year 2 – 25,250 lines**

**CELLULAR RENTALS**

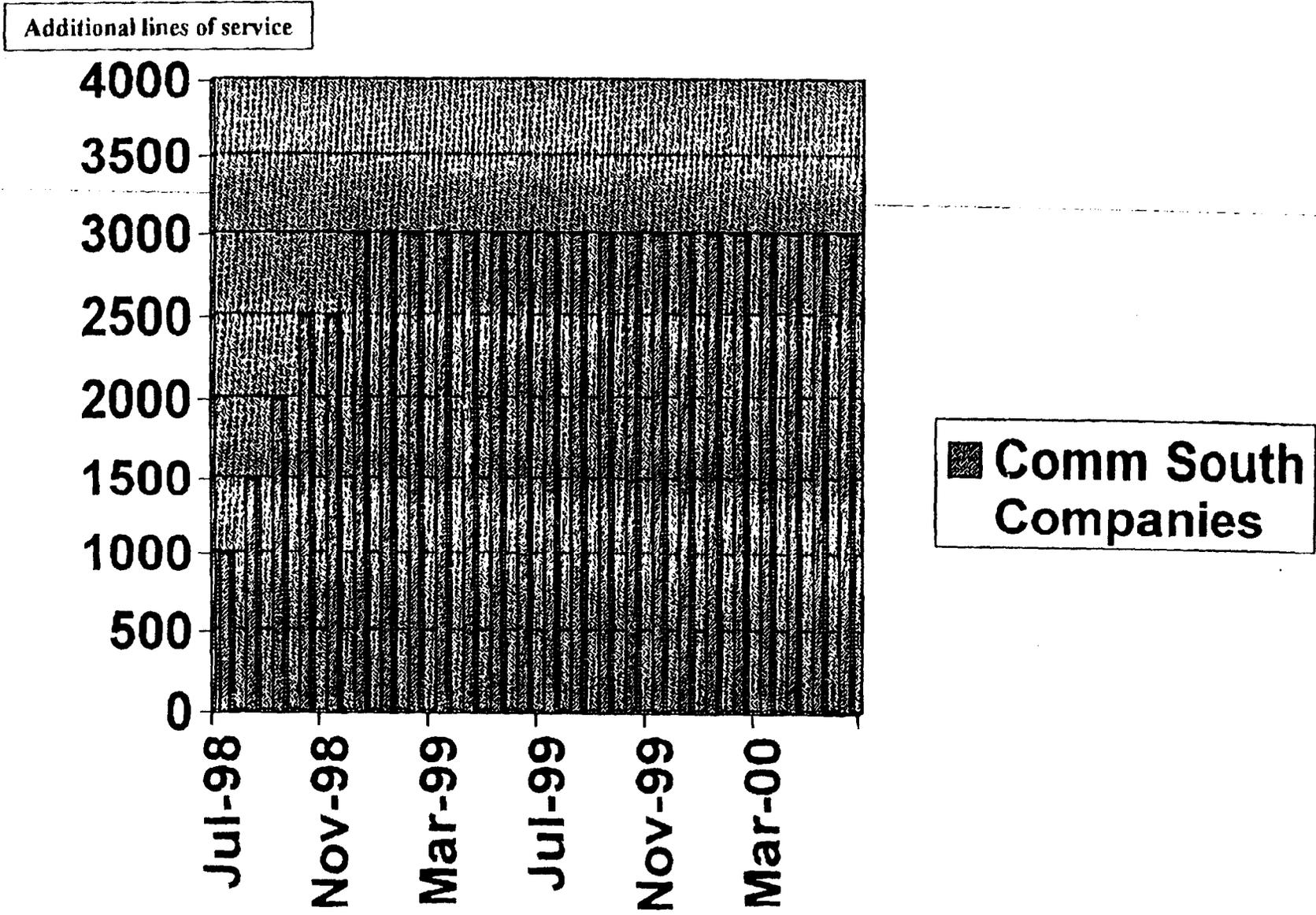
Additional Business conducted in Phil & Pitts Metro Area  
Through June of 2000

Additional lines of service



**Total after year 1 – 24,500 lines**  
**Total after year 2 – 50,500 lines**

**COMM SOUTH COMPANIES**  
 Additional business conducted in Philadelphia & Pittsburgh  
 Metro Area through June of 2000

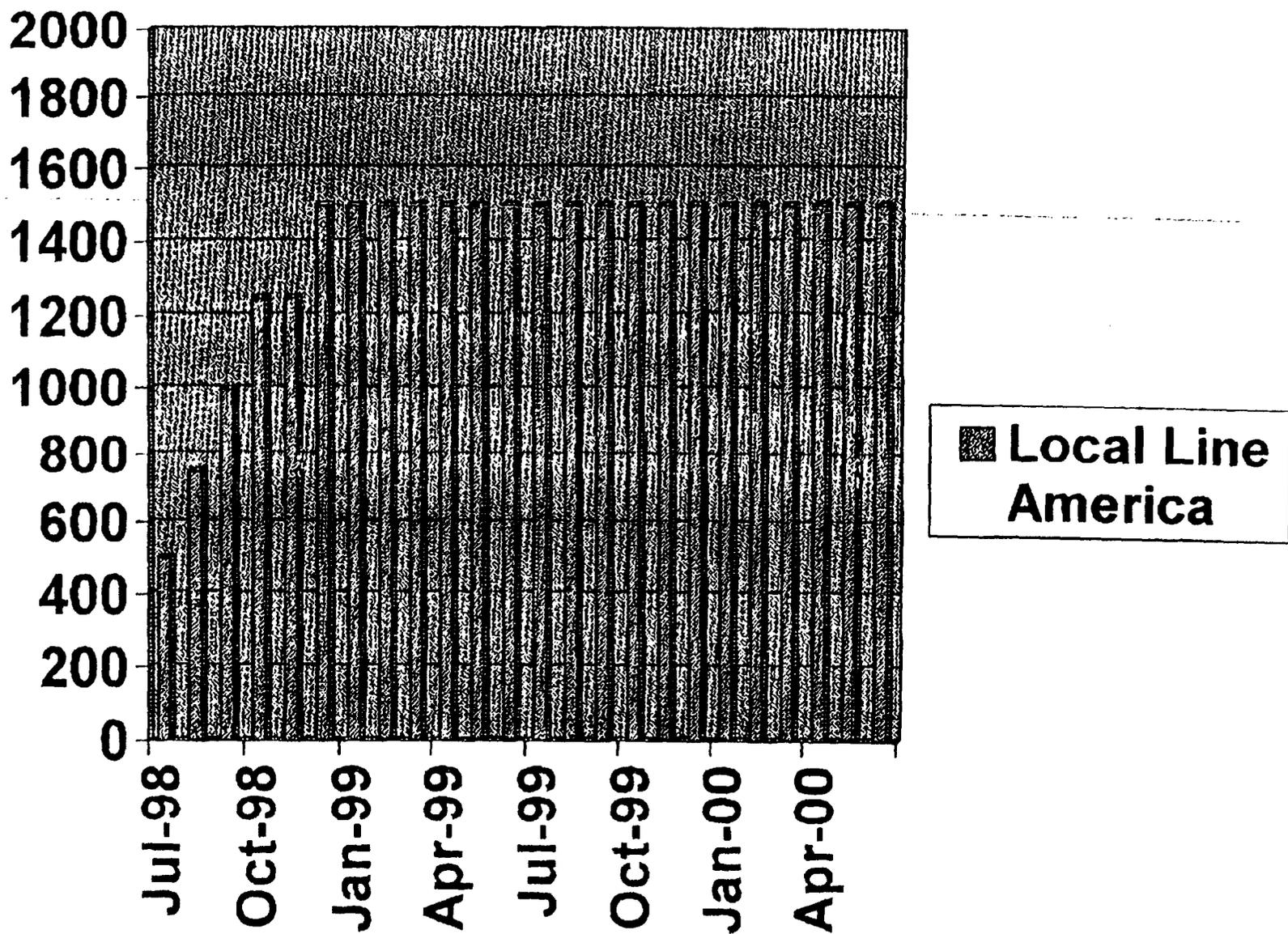


**Total after year 1 – 24,500 lines**  
**Total after year 2 – 50,500 lines**

### LOCAL LINE AMERICA

Additional business conducted in Philadelphia & Pittsburgh  
Metro Area through June of 2000

Additional lines of service

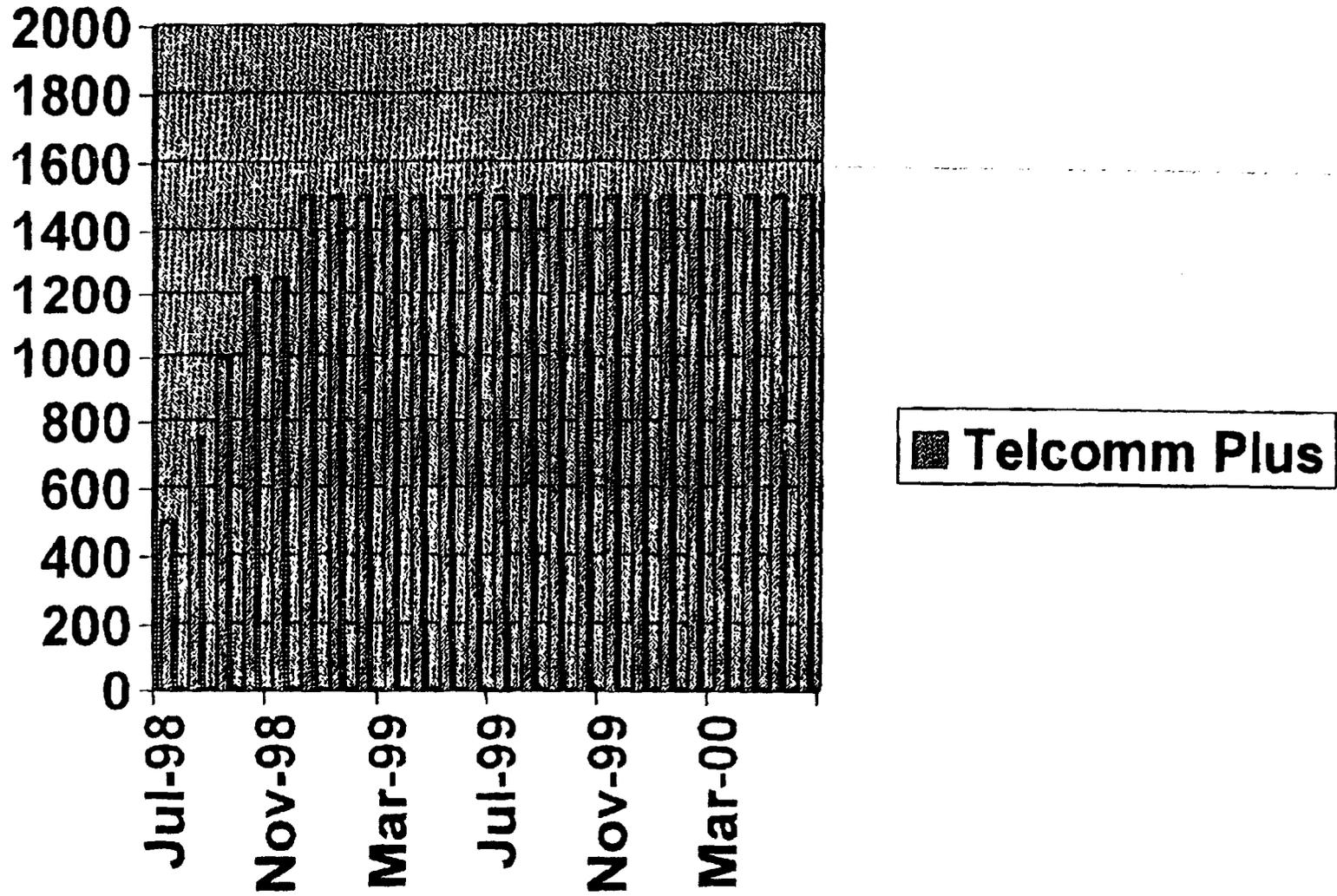


Total after year 1 – 12,250 lines  
Total after year 2 – 25,250 lines

# TELCOMM PLUS

Additional business conducted in Philadelphia & Pittsburgh  
Metro Area through June of 2000

Addition lines of service



Total after year 1 – 12,250 lines  
Total after year 2 – 25,250 lines

## **Exhibit F**

Bell Atlantic Network Services  
222 E. Livingston Road  
Room 247  
White Plains, NY 10605  
Tel: 914-422-4197 Fax: 914-422-4199

Georgene Horton  
Director - Account Management Resale Services  
Telecom Industry Services



September 25, 1998

Fisher, Wayland, Cooper, Leader & Zapagoza  
2001 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, DC 30008-1061  
Attn: Jaqualin Friend Peterson, Esq.

Dear Ms. Peterson,

We have assessed the request submitted by Mid-Atlantic Association of Alternate Local Exchange Carriers (ALECs) to develop a new blocking option in Pennsylvania which would prevent all usage, both local and toll, from being billed to a residential line. After careful consideration, we have determined that Bell Atlantic is not in a position to enter into this venture at this time.

Existing blocking options, such as, "Voluntary Toll Restriction Option" or "Call Gate Service" are available to Bell Atlantic's retail customers, as well as, to resellers. Please refer to the Pennsylvania P.U.C.-No.1., Section 22C and Section 26, for additional information.

Based upon the Telecommunications Act of 1996, if and when Bell Atlantic develops a new tariffed blocking option, it would be available to both the Retail and Resale markets.

If you have any further questions, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Georgene Horton".

Georgene Horton

cc: M. Maher  
B. Crawford  
M. Daly

## **Exhibit G**

**Bell Atlantic Network Services**  
500 Summit Lake Drive  
Floor 4  
Valhalla, NY 10595  
914 741-7412 Fax 914 747-1055

**Georgene Horton**  
Director - Account Management  
Wholesale Markets



February 9, 2000

Mr Tom Gregson  
Metro Teleconnect  
2150 Herr Street  
Harrisburg, Pa 17103

Dear Mr Gregson:

The Federal Communications Commission (FCC) has expanded the definition of a Non-Primary residence line and the definition of a multi-line business line to include lines provided by resellers of the local exchange company's (LEC) service. These changes are scheduled to become effective on February 17, 2000.

**Primary/Non-Primary residential lines:**

The Residence Subscriber line Charge (SLC), also referred to as an End User Common Line Charge (EUCL), is designated as either Primary or Non-Primary. The previous Bell Atlantic definition of a Non-Primary Residential line was any additional residential line provided by the same Local Service Provider at the same address, regardless of the named subscriber. **The expanded definition of a Non-Primary residential line is any additional residential line working at the same service location regardless of whether provided by the LEC or a Reseller.**

Our effective tariff states that the **Primary Line rate** is assessed to the residential subscriber line that meets any or all of the following conditions:

- (1) The only line provided at that service location;
- (2) The line designated as primary by the billed party or parties at that service location at the point of ordering service; or
- (3) The first line installed at that location.

Effective immediately, any additional residential exchange lines at the same service location, **regardless of local service provider, must be assessed the Non-Primary rate.**

**NOTE: Only one line per service location can be classified as Primary, and all others are considered to be Non-Primary.**

**Multi-line Business Lines**

The applicable definition when determining if a business line should be classified as a multi-line is as follows:

**When an end user is provided more than one business exchange line in the same state, regardless of whether or not there is more than one local service provider, the end user is considered a multi-line business account and all lines should be ordered accordingly.**

**This definition applies regardless of whether the business exchange lines are provided by a LEC or Reseller. Please refer to the Information Sheet attached, which will provide you with some examples of Primary/Non-Primary and Multi-line business service.**

**If you have any questions, please contact your Account Manager.**

Very truly yours,

A handwritten signature in black ink that reads "Georgene Foster". The signature is written in a cursive style with a large initial 'G' and 'F'.

## INFORMATION SHEET

When multiple residential lines are working at the same location and have one billing telephone number, Bell Atlantic's billing systems will determine if the line should be classified as Primary or Non-Primary based upon the definitions above.

When multiple residential lines are working at the same location but have separately billed telephone numbers, you must identify if the line is Primary or Non-Primary. Examples of when you will need to identify if a line should be classified as Primary or Non-Primary are as follows:

### New Connects

If a residential line that will have its own billing telephone number is requested at the same service address where there is already working residence service, you would classify the new residence line as Non-Primary and cross-reference it to the existing Primary telephone number. You would obtain the existing Primary telephone number when validating the service address. If the existing Primary telephone number is non-published, and you are unable to determine what the telephone number is, you should fill in all 9's as the cross referenced Primary telephone number.

i.e., 999 999-9999

### Disconnects

If there are two working lines at the same address that are separately billed, and you are disconnecting the Primary line, you should submit a disconnect request. If the Non-Primary line is also your customer's, you should submit a request to change the Non-Primary line to a Primary line and remove the cross reference data of the Primary line that is being disconnected.

### Migrations

When migrating an account, the SLC/EUCL should not be changed.

When placing service order requests, you will find the proper fields for designating residence lines as Primary/Non-Primary as follows:

### New York and New England

#### LSOG 2

- **LSR:** Identify the residential line with the new definition using the End User Form field 27b Primary/Non-Primary TN designation and the 27c Primary/Non-Primary Cross Reference, and fill in the appropriate information.

Valid Entries: N=Non-primary-same customer  
P=Primary-same customer  
D=Primary-different customer  
E=Non-Primary-different customer  
R=Remove designation  
B=Only line at address

**LSOG 4**

- **LSR:** Identify the residential line with the new definition using the End User Form field 27b Primary/Non-Primary TN designation and the 27c Primary/Non-Primary Cross Reference, and fill in the appropriate information.

Valid Entries: N=Non-primary-same customer  
P=Primary-same customer  
R=Remove designation  
B=Only line at address

**Delaware, DC, Maryland, New Jersey, Pennsylvania, Virginia and West Virginia**

**LSOG 2**

- **LSR:** Populate the proper USOC for Primary or Non-Primary

Valid Entries: Primary (DC, Maryland, New Jersey, Virginia and West Virginia) **USOC 9LM**  
Primary (Delaware and Pennsylvania) **USOC 9ZR11**

Valid Entries: Non-Primary (DC, Maryland, New Jersey, Virginia and West Virginia)  
**USOC 9LMMR**  
Non-Primary (Delaware and Pennsylvania) **USOC 9ZRMR**

**LSOG 4**

- **LSR:** Identify the residential line with the new definition using the End User Form field 27b Primary/Non-Primary TN designation and the 27c Primary/Non-Primary Cross Reference, and fill in the appropriate information.

Valid Entries: N=Non-primary-same customer  
P=Primary-same customer  
R=Remove designation  
B=Only line at address

- **Populate the proper USOC for Primary or Non-Primary**

Valid Entries: Primary (DC, Maryland, New Jersey, Virginia and West Virginia) **USOC 9LM**  
Primary (Delaware and Pennsylvania) **USOC 9ZR11**

Valid Entries: Non-Primary (DC, Maryland, New Jersey, Virginia and West Virginia)  
**USOC 9LMMR**  
Non-Primary (Delaware and Pennsylvania) **USOC 9ZRMR**

**MULTI-LINE BUSINESS LINES**

The following is an example of the expanded definition of a multi-line business line:

A Reseller is installing a new single business line for a customer located in Boston, Massachusetts. The same customer has working business telephone service in Taunton, Massachusetts. Under the expanded definition of the FCC order, both the Boston and Taunton lines are now considered multi-line business service and both accounts would pay the multi-line SLC/EUCL charge.

**New York and New England**

When ordering a single business line, and the end user has other working business service in the same state, a notation should be put in Remarks requesting that the multi-line SLC/EUCL rate be applied to the line. In addition, if the other working business line is your customer, you need to submit a separate LSR to change the SLC/EUCL from a single line SLC/EUCL to a multi-line SLC/EUCL.

**Delaware, DC, Maryland, New Jersey, Pennsylvania, Virginia and West Virginia**

When ordering a single business line, and the end user has other working business service in the same state, the multi-line SLC/EUCL USOC (9ZR) should be ordered. In addition, you must submit a separate LSR to change the SLC/EUCL USOC from single line SLC/EUCL to a multi-line SLC/EUCL.

FISHER WAYLAND COOPER LEADER & ZARAGOZA L.L.P.  
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202) 775-5678

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(202) 296-6518

INTERNET  
grichards@fwclz.com

WEBSITE  
<http://www.fwclz.com>

February 15, 2000

**(Via Facsimile – 914-747-1055)**

Georgene Horton  
Director – Accounts Management  
Wholesale Markets  
Bell Atlantic Network Services  
500 Summit Lake Drive, Floor 4  
Vahalla, NY 10595

**Re: Cellular Rentals, Inc. d/b/a Metro Teleconnect**

Dear Ms. Horton:

We are writing to you on behalf of our client, Cellular Rentals, Inc. d/b/a Metro Teleconnect, in response to your February 9, 2000 letter concerning Bell Atlantic's new procedures for requiring its local exchange resellers to identify Primary and Non-Primary subscriber lines. Cellular Rentals believes that Bell Atlantic, given its unique access to customer information, should continue to be responsible for determining whether or not a subscriber line is primary. Indeed, no other incumbent local exchange carrier has shifted this burden to resale carriers. In any event, the new procedures are costly and time-consuming and cannot be implemented by Cellular Rentals by February 17.

As you know, Cellular Rentals resells Bell Atlantic's local exchange services to residential customers, most of whom have been disconnected by Bell Atlantic for non-payment. Cellular Rentals orders services for these customers through Bell Atlantic's electronic database interface ("EDI") program. In many cases, the information available to Cellular Rentals from Bell Atlantic is out of date or inadequate to determine whether or not the new customer's line is the primary line.

For example, a new Cellular Rentals customer's Bell Atlantic line may be in a suspend status awaiting disconnection. Thus, the Cellular Rentals line initially may be non-primary but will become primary following disconnection. In other cases, there may be multiple lines and billing telephone numbers at a single address and it will not be evident to Cellular Rentals whether its customer's line should be should treated as

Georgene Horton  
February 15, 2000  
Page 2

primary. In addition, only Bell Atlantic has access to information concerning non-published numbers, as well as future Bell Atlantic or CLEC connections or disconnections at any address. Therefore, Bell Atlantic is in the best position to determine the primary and non-primary lines.

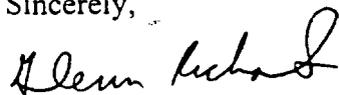
Furthermore, the new procedures affect disconnection of Cellular Rentals customers. Today, Cellular Rentals submits electronically weekly disconnection orders. Under the new procedures, Cellular Rentals will manually have to review each disconnect to determine whether there are multiple lines at this address and whether the disconnect requires a change in the status of the remaining lines.

The costs and time to make the required changes to the local service request form are significant. New fields will have to be added in the EDI program. Until the new fields are tested, new orders will have to be completed manually. In addition, as noted above, disconnection orders will have to be submitted manually and Cellular Rentals will have to hire additional personnel to handle such orders. Cellular Rentals estimates that this change will initially cost more than \$100,000 and take as long as 60 days to complete. This cost will grow as the Cellular Rentals customer base grows. In no event, will any changes take place by the February 17 effective date stated in your letter. As discussed earlier, even after the changes are made, the information provided by Cellular Rentals may not be accurate at the time submitted or may be subject to change in the future.

Again, we request that Bell Atlantic reconsider its position and maintain responsibility for determining the primary and non-primary status of end user lines. We believe that the current process best serves the needs of both our companies and the end user customers as well.

Please contact the undersigned if you have any questions.

Sincerely,



Glenn S. Richards  
Counsel to Cellular Rentals, Inc.

CC: Robert Atkinson, Common Carrier Bureau, FCC

## **Exhibit H**

		Non-Recurring & Recurring.
Time of Call	Char (06)	Time the call was made. Required for Usage. Optional for Non-Recurring and Recurring.
From Number	Char (10)	Calling number. Required for Usage. Optional for Non-Recurring & Recurring.
To Number	Char (10)	Number called Required for Usage. Optional for Non-Recurring & Recurring.
USOC	Char (05)	Indicates the USOC associated with the claim. Required if Record type is B or 5 or if Out of Service Indicator is 3. Not required for Usage and Non-Recurring. Required for Recurring.
From/Install Date	Char (08)	Claim period start date. Not required for Usage and Non-Recurring. Required for Recurring.
To Date	Char (08)	Claim period end date. Not required for Usage and Non-Recurring. Required for Recurring.
Notation	Var Char (675)	Additional description of claim. Optional.

#### **4.4.8 Claim Escalation Process**

Within 2 business days from receipt of a claim, the representative will contact an *expected* date of resolution.

If that date has expired and no resolution has been offered, the Reseller will representative for a status.

- Once contact has been made, depending upon the complexity or vo the reseller can either allow the representative additional time to re the Team Leader.
- If the Reseller is unable to reach the representative, he/she may esc Leader.

If the resolution of the claim is not satisfactory, the Reseller should first cont representative to discuss the details. If the Reseller is still not satisfied, escala Leader will be transacted by the representative.

Once escalated, the Team Leader has 24 hours to evaluate the claim, provide resolve the claim.

If, after 24 hours, the issue is still open, the Reseller may escalate to the Mana the Manager has 24 hours to provide status and/or resolution.

If after 24 hours, there has been no satisfactory resolution or status offered, t escalate to the District Manager for a call back on the next business day. It is the Reseller to escalate up through the different management levels at Bell A

Bell Atlantic Contact Lists can be found in Volume I, Section 8.1.

## **Exhibit I**

- Local Number Portability Surcharge
- Retail prices that are in effect for no more than 90 days
- Charges for services and products provided by Bell Atlantic that are not Voice Mail, Telecommunications Services under the Telecommunications Act of 1996 (e.g., Bell Atlantic Ancillary Services, Exchange Access Services)
- Any service or charge, which the appropriate state regulatory body, the FCC, or other governmental entity with appropriate jurisdiction determines, is not entitled to a discount under 47 U.S.C. § 251 (c)(4).

#### **5.1.4 Claims**

This section explains the procedure for submitting a claim for any billing problems that may occur.

Resellers may initiate inquiries by submitting a written claim to the appropriate TISOC. All billing disputes are handled by the TISOC.

Adjustments will be processed and applied at the master account level, or to the component account when appropriate.

When a claim is submitted, the TISOC representative will:

- Validate the information
- Explain the charges
- Process an adjustment if appropriate
- Confirm the status of the claim to the Reseller by mail, fax or phone

Disputes are handled as promptly as possible. If disputes cannot be handled within 30 days, the representative will notify the Reseller of the reason for delay and indicate an expected date for resolution.

Resellers will receive credit for late payment charges, if any, on pending claims, for the amount of the bill that is being claimed. All other billed amounts must be paid and late payment charges will be applicable to unpaid unclaimed amounts. If a claim is subsequently denied, normal payment terms, including late payment charges, will apply to the unpaid amount from the date of denial.

In all cases, late payment charges, as regarding claims, will be calculated and applied in accordance with the tariff for the jurisdiction in question, or as applicable under the reseller's agreement.

#### **5.1.5 Daily Usage File**

The Daily Usage File (DUF) produces a record of call details originating

CERTIFICATE OF SERVICE

I, Sylvia A. Davis, hereby certifies that a true copy of the foregoing COMMENTS OF NATIONAL ALEC ASSOCIATION/PREPAID COMMUNICATIONS ASSOCIATION was served by first class mail, postage prepaid, this 1<sup>st</sup> day of March, 2000, upon the individuals listed below, and by hand delivery upon the individuals indicated with an asterik.

  
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