

Authorization

Please review the changes/additions outlined above for the Identify All Alternate Operator Service Providers and Separate Their Charges to Comply With Truth-in-Billing Regulations process. If you have any questions regarding this document, please contact Sara Prud'homme at (518) 431-7527 or sprudhom@commsoft.net. This document may be marked up with changes and returned by FAX. Our FAX number is (518) 427-1642.

The implementation of the Identify All Alternate Operator Service Providers and Separate Their Charges to Comply With Truth-in-Billing Regulations process will not begin until we have received a signed copy of this document from you indicating your acceptance. Requests to modify this functionality after receipt of this signed document will be considered separate chargeable items.

Signature Gregory D. Sloan Date 9/28/99
Name Gregory D. Sloan
Title Security Manager

11/15/99 add

The intended release for implementing this item is in CommVergence version 6.07, which is scheduled to ship to customers on 11/15/99. We ask that you please review and return this document as described under "Authorization" by 10/01/99. Please note that if the document is not received by 10/01/99, we cannot guarantee that it will be included in the intended release.

Please Note: If your Account Manager does not receive any correspondence from you regarding this issue by 10/01/99, Aptis will consider that as an indication that this requirement has been withdrawn by your company.

Authorization

Please review the changes/additions outlined above for the Add Messages to Bill Print to Comply With Truth-in-Billing Regulations process. If you have any questions regarding this document, please contact Sara Prud'homme at (518) 431-7527 or sprudhom@commsoft.net. This document may be marked up with changes and returned by FAX. Our FAX number is (518) 427-1642.

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Signature Gregory D. Sloan Date 9/20/99
Name Gregory D. Sloan
Title Security Manager

Customer: North Pittsburgh Telephone
Contact: Gregory Sloan
Aptis Tracking ID: DWI19394
Aptis Responsible Dept.: CommVergence Support & Development (Interfaces Team)
Date: 10/12/99

Add Carrier Message to Bill Print to Comply With Truth-in-Billing Regulations

Business Requirements

Client has requested the following messages print when a subscriber changes their local exchange carrier, local toll service provider, or long distance provider. These messages will display under the "Non-Basic" charges section.

When the local toll carrier changes within that bill cycle, this message will print, "YOUR LOCAL TOLL CARRIER (For *area code*) WAS CHANGED EFFECTIVE WITH THIS BILL."

When a subscriber changes to a different local exchange carrier, this message will print, "YOUR LOCAL EXCHANGE CARRIER WAS CHANGED EFFECTIVE WITH THIS BILL."

When a subscriber changes to a different long distance provider, this message will print, "YOUR LONG DISTANCE TOLL CARRIER WAS CHANGED EFFECTIVE WITH THIS BILL."

Implementation

To implement this change, Aptis will:

1. Change the bill print program to use the SAPPHY01 (SOS Access Provider) file and look at the bill date field to see if it is between the service order from and to date. This will enable us to determine if the carrier has changed within a bill cycle.
2. Change the bill print program to use the SAAPHY01 (ACT Access Provider) file to determine if it is an IntraLATA or InterLATA carrier.
3. Change the bill print program to use the ACTPHY01 (ACT Service Account) file to determine the exact area code for the service account that changed carriers.
4. Change the printer file to hard code the three messages mentioned in the "Requirements" section of this document.

Cost

Item	Estimated Hours	Cost per Hour	Total
Analysis & Design			
Database Changes and Coding			
Testing/Debugging/Review – Development			
Quality Assurance Testing			
Documentation			
Total for Project			

Total estimated cost for this project is \$. *This is an estimate only.* All charges will be based on a time and materials basis. Actual charges for implementing this functionality may be less than or may exceed this estimate. If you accept the functionality outlined in this document as a solution to your requirement (as indicated by returning a signed copy of this document as described under the sections below), your company will be billed monthly for the actual hours incurred at our current published hourly rates.

Implementation Timeframe and Customer Signoff

The intended release for implementing this item is in CommVergence version 6.07, which is scheduled to ship to customers on 11/15/99. We ask that you please review and return this document as described under "Authorization" by 10/18/99. Please note that if the document is not received by 10/18/99, we cannot guarantee that it will be included in the intended release.

Please Note: If your Account Manager does not receive any correspondence from you regarding this issue by 10/18/99, Aptis will consider that as an indication that this requirement has been withdrawn by your company

Authorization

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Signature Gregory D. Skon Date 10/14/99
Name Gregory D. Skon
Title Security Manager

FAX TRANSMITTAL SHEET

FAX #: (724) 443-9431

DATE: 10/14/97

PLEASE DELIVER COPIES TO: Sara Prud'homme

FROM: GREG SLOAN

PHONE NUMBER: (724) 443-9518

FAX NUMBER: (724) 443-9431

TOTAL NUMBER OF PAGES SENT (INCLUDING THIS PAGE): 4

IF YOU HAVE ANY PROBLEMS RECEIVING THIS TRANSMITTAL, PLEASE
CALL KAREN AT (724) 443-9542.

REMARKS: Signed Requirements document

as you requested.

Greg

Greg Sloan

From: Sara Prudhomme [SPRUDHOM@commsoft.net]
Sent: Tuesday, October 12, 1999 4:56 PM
To: Greg Sloan
Cc: Erike Lehtinen
Subject: Truth-in-Billing



DWI19394--TIB 3rd
document.doc..

Hi Greg,

I have attached the third requirements document for your Truth-in-Billing requests. Please return a signed copy to me by October 18.

Keep in mind, all of the Truth-in-Billing documents I have sent are for the N. Pitt company only.

<<DWI19394--TIB 3rd document.doc>>

Thanks Greg and have a great night!

Sara Prud'homme
Business Analyst

Customer: North Pittsburgh Telephone
Contact: Gregory Sloan
Aptis Tracking ID: DWI19394
Aptis Responsible Dept.: CommVergence Support & Development (Interfaces Team)
Date: 10/12/99

Add Carrier Message to Bill Print to Comply With Truth-in-Billing Regulations

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1. Change the bill print program to use the SAPPHY01 (SOS Access Provider) file and look at the bill date field to see if it is between the service order from and to date. This will enable us to determine if the carrier has changed within a bill cycle.
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3. Change the bill print program to use the ACTPHY01 (ACT Service Account) file to determine the exact area code for the service account that changed carriers.
4. Change the printer file to hard code the three messages mentioned in the "Requirements" section of this document.

Cost

Item	Estimated Hours	Cost per Hour	Total
Analysis & Design			
Database Changes and Coding			
Testing/Debugging/Review – Development			
Quality Assurance Testing			
Documentation			
Total for Project			

Total estimated cost for this project is \$ *This is an estimate only.* All charges will be based on a time and materials basis. Actual charges for implementing this functionality may be less than or may exceed this estimate. If you accept the functionality outlined in this document as a solution to your requirement (as indicated by returning a signed copy of this document as described under the sections below), your company will be billed monthly for the actual hours incurred at our current published hourly rates.

Implementation Timeframe and Customer Signoff

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Signature Gregory D. Skan Date 10/14/99
Name Gregory D. Skan
Title Security Manager

Greg Sloan

Truth In Billing

From: Elizabeth Gagne [egagne@commsoft.net]
Sent: Wednesday, October 27, 1999 2:08 PM
To: Greg Sloan
Cc: APPLICATION SUPPORT; Level 1 Support
Subject: RE: Issue Number 16966

Greg,

I have forwarded this to the Interfaces team for review. We will let you know what needs to be done if anything.

Thank You,

Elizabeth Gagne
Application Support

> -----Original Message-----

> From: Greg Sloan [SMTP:gdsloan@nptc.com]
> Sent: Wednesday, October 27, 1999 2:08 PM
> To: Support Aptis (E-mail)
> Cc: Kevin Albaugh; Norm Carpenter
> Subject: Issue Number 16966

>
> Aptis Support:

>
> Issue Number 16966 has to do with some of the changes we require to comply
> with the FCC's Truth-In-Billing requirements. This particular issue asked
> for the ability to identify all AOS service providers on our bills, to
> separate their charges and to print the AOS provider name on our bills.

>
> On further advice from our legal counsel, we are advised to print that AOS
> provider's 800 number on our bills (in addition to the AOS provider name).
> Therefore I need to amend my request to ask you to also print the AOS
> provider 800 number.

>
> I am hopeful that this is a fairly simple revision to my request. If it
> requires additional work which effects your quote to us, please send a
> revised authorization document to me ASAP.

>
> Questions?

>
> Thanks.

>
> GREG SLOAN
> PHONE: (724)443-9518
> FAX: (724)443-9431
> E-MAIL: gdsloan@nptc.com

November 30, 1999

KATHY ROMAN
INDEPENDENT NECA SERVICES
80 SOUTH JEFFERSON ROAD
WHIPPANY, NJ 07981

Dear Kathy:

Attached is North Pittsburgh Telephone Company's response to your request for time and cost estimates for work necessary to comply with the FCC's Truth-In-Billing requirements.

These cost estimates were provided to us by our service bureau (Aptis, a subsidiary of Billing Concepts).

Please notice that our response does not include separate figures for the work necessary to provide a 'Toll Free Number on (our) Bill'. Those amounts are included in the figures to provide the 'Sub CIC Identification'.

If you have any questions about this response, please contact me at my direct dial number, (724)443-9518.

Very truly yours,



Gregory D. Sloan
Applications/Security Manager

Attachment

cc: K. Albaugh - NPTCo

March 2, 2000

ARMSTRONG GROUP OF COMPANIES
ATTN: JIM MARGARIA
ONE ARMSTRONG PLACE
BUTLER, PA 16001

Dear Jim:

Enclosed is a "Special Bulletin" we received from Illuminet addressing one of the FCC Truth-In-Billing (TIB) issues. The "Bulletin" indicates that Illuminet will provide a TIB 020A module (as established by the Ordering & Billing Forum, OBF) to us so that we can properly display new service provider information on our bills. This will allow us to comply with this one TIB requirement. We now need to determine if and when Aptis/Armstrong can accept Illuminet's 020A module.

Mike Visconti also faxed me some information today about an 002B Module which carries Alternate Billing Entity Indicators, Secondary Billing Entity Indicators and a Billing Entity Identifier. I would also like to know if Aptis/Armstrong can accept this module.

Illuminet's "Bulletin" is dated February 29, 2000. I received it yesterday. And Illuminet is looking for a response by March 8, 2000. I know this is a very quick response. I would appreciate your help in obtaining an answer for us.

Please contact me if you have any questions about this letter.

Very truly yours,


Gregory D. Sloan

Enclosure

cc: K.J. Albaugh – NPT K. Goodnight - NPT
N.W. Barthlow – NPT R. Thony - Armstrong
N.T. Carpenter – NPT M.L. Visconti - Armstrong



ILLUMINETSM

Special Bulletin

Tuesday, February 29, 2000

TO: ILLUMINET's Billing and Collections Customers

Truth in Billing Information Request

Federal Communications Commission (FCC) mandated Truth-in-Billing order (FCC Rules 64.2401) requires that new service providers be identified/highlighted on the end-user bill. The telephone bill should contain clear and conspicuous notification of any change in service provider.

The FCC Truth-in-Billing order compliance date is April 1, 2000.

The Ordering and Billing Forum (OBF) has recently established a solution to address this FCC mandate. The Message Processing Committee of the OBF reached consensus on the creation of a new Truth-in-Billing module (Module 020A) for a New Service Provider with the following values:

- 1 = new pre-subscribed provider
- 2 = new non-pre-subscribed provider
- 3 = new unspecified provider

This guideline, established by the OBF, will identify to the billing Exchange Carrier (EC) that the service provider noted on the record requires identification as a *new* service provider on the end-user bill. A new service provider constitutes any provider not on the previous month's bill. This includes a pre-subscribed provider "PIC'ed" by the end-user.

ILLUMINET has requested all of our message providers to comply with the OBF guidelines and to provide the TIB 020A module to ILLUMINET. This will facilitate ILLUMINET's ability to provide your company a TIB 020A module in order for you to accurately display the new service provider data on your end user's bill. Please notify ILLUMINET if your company intends to accept the TIB 020A module and when ILLUMINET may begin sending the TIB 020A module to you. This information is necessary to ensure that ILLUMINET can make the appropriate system changes to transfer this data to you. Your completion and return of the requested information via fax by March 8, 2000, is appreciated. Again, the FCC Truth-in-Billing order **compliance date is April 1, 2000**.

If you have questions, please do not hesitate to contact your ILLUMINET Customer Service Specialist, Christi Day, at (360) 923-3436).



Please complete the information below and fax this form back to ILLUMINET, **Attn: Sarah Gammon at (360) 923-3477.**

_____ Yes, we will comply with OBF guidelines and will be receiving the 020A "new service provider" Module from ILLUMINET.

We will be ready to receive the 020A Module from ILLUMINET by the following date:

_____ No, we will not be ready to follow the OBF guidelines and will not be able to receive the 020A "new service provider" Module from ILLUMINET.

Company Name: _____ Company OCN# _____

Contact Name: _____



**THE
ARMSTRONG
GROUP OF COMPANIES**

ONE ARMSTRONG PLACE • BUTLER, PA 16001 • (724) 283-0925

FAX NO. (724) 283-1420

TELEFAX COVER SHEET

DATE: 3.2.00

TO: GREG SLOAN - NPTC

FROM: MIKE VISCONTI - AGOC

NO. OF PAGES (INCLUDING COVER SHEET) 2

If you do not receive any of the pages being transmitted, please call our office at the above telephone number. Thank you.

Comments: 443-9431

CONFIDENTIALITY NOTICE

This transmission is intended only for the use of the individual or entity to which it is addressed, and may contain confidential information belonging to the sender. If you have received this transmission in error,

ATIS/OBF-EMI-016
January 1999

Secondary Billing Entity

Module 002-B

001	0	Number	Module ID	X
002	0			
003	2			
004	B	Version		
005	0	Module Length		9
006	1			
007	5			
008	Alternate Billing Entity Number			9
009	Secondary Billing Entity Number			9
010				
011				
012				
013				
014	Billing Entity Identifier			9
015				

Field Characteristics

- 9 - Numeric
- X - Alphanumeric

Module Description

A 15-position module consisting of a one-digit **Alternate Billing Entity Indicator**, a five-digit **Secondary Billing Entity Number**, and a two-digit **Billing Entity Identifier**.

This module is designed for use when more than one **Billing Entity Number** must be present in the record. The **Primary Billing Entity** is shown in the base record in positions 150-152.

The **Alternate Billing Entity Indicator** has a value of "1" when the **Billing Entity** does not have a carrier access code assigned; i. e., does not subscribe to **Feature Group B** or **Feature Group D** access service. Otherwise, this **Indicator** has a value of "0."

The **Billing Entity Identifier** is defined as follows:

- 01 Transport Carrier
- 02 Customer-Perceived Carrier

FAX TRANSMITTAL SHEET

FAX #: (724) 443-9431

DATE: 3/02/00

PLEASE DELIVER COPIES TO: Jim Margaria

FROM: GREG SLOAN

PHONE NUMBER: (724) 443-9518

FAX NUMBER: (724) 443-9431

TOTAL NUMBER OF PAGES SENT (INCLUDING THIS PAGE): 6

IF YOU HAVE ANY PROBLEMS RECEIVING THIS TRANSMITTAL, PLEASE
CALL KAREN AT (724) 443-9542.

REMARKS: I have decided to fax this to you to get it

in your hands quickly.

I mailed the original.

Greg

Greg Sloan

From: Kevin Albaugh
Sent: February 25, 2000 1:06 PM
To: Kelly Goodnight; Greg Sloan
Cc: Lynn Scullo
Subject: FW: Re: ILLUMINET - Truth In Billing Modules

-----Original Message-----

From: Peggy Daniels [SMTP:pdaniels@illuminet.com]
Sent: February 24, 2000 8:15 PM
To: Peggy Daniels
Subject: Fwd: Re: ILLUMINET - Truth In Billing Modules

Regarding the modules for Truth in Billing, I just received the following interim information :

ILLUMINET will be sending a separate communication to all LECs, regarding the 020A Module and asking when they can begin receiving it. This information will also be contained in the next TCH Update, which will be delivered, as usual, by FAX.

Because it is the responsibility of the carrier (per the FCC) to implement this module, ILLUMINET has not been aware of the content. ILLUMINET is to begin receiving modules from carriers on March 1. ILLUMINET will capture these modules during the month of March for the April 1 deadline, and will be in compliance.

ILLUMINET will send the 020A Module to all billing providers by April 1, 2000.

I will forward the above referenced by e-mail and continue to keep you advised as information is available. In the meantime, please don't hesitate to contact me or your Customer Service Specialist, Christi Day, @ 360-923-3436, if we can be of assistance. Peggy

PEGGY DANIELS, Senior Account Manager
ILLUMINET

99 Westview Drive, Akron, PA 17501
TEL: 717-859-2555
FAX: 717-859-2541
e-mail: pdaniels@illuminet.com

Visit our Web site at www.illuminet.com

Greg Sloan

To: Kevin Albaugh
Cc: Bill Barthlow; Norm Carpenter; Kelly Goodnight; Jim Margaria (E-mail); Roslyn Thony (E-mail)
Subject: Truth - In - Billing (TIB)
Importance: High

Kevin:

I'm sending this e-mail since it will also provide a written record (as you've requested) of our attempts to comply with TIB requirements.

I met with Armstrong (Roslyn Thony, Mike Visconti and John Erickson) on Friday (3/10/00) and I also called Roslyn at Armstrong yesterday (3/13/00) and today (3/14/00 at 11:30 AM). Roslyn had previously contacted Aptis for a response about when they will complete changes to allow us (AGOC and NPT) to comply with the FCC's TIB requirements. She had asked them specifically for a compliance date (when they expect to have functionality in place so we can comply with the TIB regulations). She had asked for that information by late last week, by yesterday (3/13) and by this morning (3/14 prior to noon). At this time, we still do not have Aptis' response.

I have suggested (and you agree) that at this point, Aptis has delivered changes which allow us to comply with only one of the five TIB issues we had sent to them. We know that they will not be able to deliver the additional changes to comply by April 1, 2000. However, again, we do not (at this time) know when they expect to deliver those required changes.

Roslyn has indicated that Armstrong is going to respond in their waiver to the FCC that they will be in compliance by July 1, 2000. Without any other response from Aptis yet, we may want to consider a similar date.

Questions?

I'll let you know as I hear more.

GREG SLOAN
PHONE: (724)443-9518
FAX: (724)443-9431
E-MAIL: gdsloan@nptc.com

Greg Sloan

To: Jim Margaria (E-mail); Roslyn Thony (E-mail)
Cc: Bill Barthlow; Kelly Goodnight; Kevin Albaugh; Norm Carpenter
Subject: Truth - In - Billing

Importance: High

Jim & Roslyn:

Attached is a letter about the FCC's April 1, 2000 Truth-In-Billing deadline. This letter requires a written response (from Aptis) by March 10, 2000. As recently instructed, I am forwarding this letter to you (I did not mail it to Aptis). I understand that you will then function as our interface with Aptis.



TIBletter.doc

Jim & Roslyn - I am mailing an original and a copy of this letter to you.

Bill, Kelly, Kevin & Norm - Your copies are in the inter-company mail.

Questions?

GREG SLOAN
PHONE: (724)443-9518
FAX: (724)443-9431
E-MAIL: gdsloan@nptc.com

Greg Sloan

From: Mark Bowhall [Mark.Bowhall@aptissoftware.com]
Sent: March 15, 2000 6:23 PM
To: 'Rosalyn Thony'; 'mlviscon@nptc.com'; 'gdsloan@nptc.com'; 'normc@nauticom.net'
Cc: Jim Lazur; Bob Rubbone
Subject: TIB documentation



NPT_TIB_letter.doc



TIB_Requirements.doc

The following is sent on behalf of Jim Lazur and Bob Rubbone. Please forward to the following individuals as I do not have mail addressing to them. Thank you.

K. Albaugh, N. Barthlow, K. Goodnight

<<NPT_TIB_letter.doc>> <<TIB_Requirements.doc>>

Mark Bowhall
Business Analyst III - Customer Care
Aptis, A Subsidiary of Billing Concepts
Phone: 518-433-7625 Fax: 518-427-1642
email: mark.bowhall@aptissoftware.com

Aptis, Inc.
A subsidiary of Billing Concepts
8 Southwoods Blvd.
Albany, New York 12211
March 15, 2000

Mr. Jim Margaria
Armstrong Group of Companies
One Armstrong Place
Butler, PA 16001

Dear Mr. Margaria;

This letter is to inform you of Aptis' current state of preparedness in our CommVergence product with regard to the FCC Truth-in-Billing rules, which are to become effective April 1, 2000. Specifically, we are addressing the CommVergence product only as it relates to both sites of the North Pittsburgh Telephone Company.

This letter replaces the one sent to you March 8, 2000 and rescinds the comments contained therein.

Referencing a letter to you from Gregory D. Sloan dated March 1, 2000; Aptis has completed 1 of the 5 points of compliance itemized in that document. CommVergence will now:

- Produce a bill that "distinguishes between charges for which non-payment will result in disconnection of basic local service, and charges for which non-payment will not result in such disconnection"

While we have unit tested the above functionality here at Aptis, we are waiting for North Pittsburgh's confirmation of test results. At this time, CommVergence does not:

- Clearly identify the name of the service provider associated with each charge
- Separate charges by service provider
- Provide "notification of any change in service provider, including notification that a new provider has begun providing service". A "new service provider" is "any provider that did not bill for services on the previous bill statement" and includes local exchange or interexchange carriers
- Provide "information that the customer may need to make inquiries about, or contest charges" and "display a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill"

Aptis will deliver these enhancements, as described in the Requirements document dated 3/14/00, within 90 days after written acceptance of the same by Armstrong.

I also want to give you a current status on CommVergence modifications relevant to compliance with processing of data from modules **TIB020A** and **TIB002B**.

Relating to processing for module TIB002B – Aptis' CommVergence has been programmed and successfully unit tested. The application will accept input data streams from TIB002B and process without fault or exception. While data transmitted to CommVergence via this format will be processed and stored, it will not be printed on production generated bills at this time.

Related to processing for TIB020A – Aptis' CommVergence has also been programmed and successfully unit tested. The application will accept input data streams from TIB020A and process without fault or exception. However, data transmitted via this format will not be stored or available on output items.

Also related to TIB020A, it is the responsibility of North Pittsburgh Telephone Company to work with Illuminet to get a clear and specific definition of the data contents of positions 009-020 (Local Company Use) of the sample record definition.

With regard to both of these modules, all unit testing was completed with Aptis generated input data. No sample data has been received from any other source for the purposes of system testing.

Please let me know if you have any questions regarding this information. Thank you.

Very truly yours;

Bob Rubbone
Service Unit Manager

cc: K. J. Albaugh – NPT
N. W. Barthlow – NPT
N. T. Carpenter – NPT
K. Goodnight – NPT
G. Sloan - NPT
R. Thony – Armstrong
M. L. Visconti - Armstrong

**POKA LAMBRO TELEPHONE COOPERATIVE, INC.
 POKA LAMBRO TELECOMMUNICATIONS, INC.
 dba POKA LAMBRO TELEPHONE COMPANY**

Poka Lambro Telephone Cooperative, Inc. ("Poka Lambro") and Poka Lambro Telecommunications, Inc. ("PLTI") ("Petitioners") provide exchange and exchange access services in Texas to approximately 3,500 access lines and 300 access lines, respectively. As a telephone cooperative, Poka Lambro provides end user billing services to its members/owners. Poka Lambro is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. Petitioners provide billing and collection services for third party providers including such services for certain interexchange carriers' 1 + traffic and for providers of casual calling and alternate operator services. Petitioners utilize APTIS for the provision of end user billing software. Petitioners have made frequent periodic contacts with their billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and have made reasonable and good-faith efforts to ensure that APTIS would be taking all necessary steps to ensure that the software upgrades and modifications to their end user billing systems would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 15, 2000 that APTIS indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioners to assess what TIB compliance issues remained. Despite the Petitioners' reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioners' control.

Based on the information that APTIS has provided to date, Petitioner requests the following waivers for the time periods noted.

<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000
TIB Service Provider Name and Inquiry Contact Requirement	47 C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	July 1, 2000

Until the requested waiver expires, the Petitioners will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF DAVID MCENDREE

I, David McEndree, General Manager of Poka Lambro Telephone Cooperative, Inc. and Poka Lambro Telecommunications, Inc. dba Poka Lambro Telephone Company ("Petitioners"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioners is true and accurate to the best of my knowledge, information, and belief.

Date Mar 21, 2000

David McEndree
David McEndree
General Manager

**Poka Lambro Telephone Cooperative, Inc.
Chronology of Contacts with APTIS (billing software vendor)
Regarding Truth in Billing Requirements**

- ◆ 1/14/00 – Faxed request to APTIS for a Time and Cost for the Truth in Billing changes and a request for changes to our late notice process. A Summary of Truth in Billing Requirements and other Texas PUC information was also faxed.
- ◆ 1/19/00 – Faxed a copy of JSI CLIENT ALERT and another copy of the Summary of Truth in Billing Requirements to APTIS. This client alert reviews the FCC's limited issuance of waivers for TIB compliance
- ◆ 2/7/00 – Received a fax from APTIS regarding the Time and Cost estimate for Change Disconnect/Warning Notice Processing.
- ◆ 2/7/00 – Received an e-mail from APTIS regarding the request for a detailed list of requirements to meet the Truth in Billing changes by the April 1, 2000 deadline.
- ◆ 2/8/00 – Received fax from APTIS regarding the need for clients to file an extension to the April 1 deadline. Their (APTIS) resources may limit their ability to complete all the changes required. They also make a request for us to send more details.
- ◆ 2/10/00 – Poka Lambro Board approves the Time and Cost estimate for Change Disconnect/Warning Notice Processing.
- ◆ 2/11/00 – E-mail to APTIS from Poka Lambro regarding the requirements for TIB implementation, again, and notes that a conference call would be in order to make sure we all understand the importance of compliance with this issue.
- ◆ 2/14/00 – E-mail request from APTIS for any additional requirements than previously determined. APTIS also notes that each state may also have special requirements through the PUC or PSC to add or delete from the FCC requirements.
- ◆ 2/18/00 – Received a fax from APTIS regarding an outline of the Requirements Document for the Truth in Billing modifications and estimate of the cost for the project. The signed approval due on February 23, 2000.
- ◆ 2/23/00 – Poka Lambro Board approved the Requirements Document for the Truth in Billing modifications.
- ◆ 2/23/00 – Re-faxed to APTIS the APTIS Request Form for the Time and Cost for the Truth In Billing changes, along with other Texas PUC information gathered by Poka Lambro. (same information as faxed on 1/14/00)
- ◆ 2/24/00 – The signed Requirements Document for the Truth in Billing modifications was faxed to APTIS.

- ◆ 3/3/00 – A copy of Poka Lambro's bill format was faxed to APTIS per their request.
- ◆ 3/7/00 – Copies of the memo dated 2/15/00 from Independent NECA Services, Inc. and the "special bulletin" dated 2/29/00 from Illuminet regarding Truth in Billing Requirements were faxed to APTIS.
- ◆ 3/9/00 – Received letter from APTIS stating they do not feel they will be able to deliver the solution to the Truth in Billing requirements by the April 1, 2000 deadline. They are urging all clients to file for an extension with the FCC by March 15th.
- ◆ 3/13/00 – Received an e-mail from APTIS to set up a conference call to discuss the Business Unit re-organization & change in processes.
- ◆ 3/14/00 – Poka Lambro e-mailed APTIS with a time & date for the conference call, with the addition of discussing the Truth in Billing issue as well.
- ◆ 3/15/00 – Conference call with three members of Poka Lambro staff and four members from APTIS. There were discussions regarding the sub-cic and deniable/non-deniable charges. These are the two key issues that APTIS does not have working yet. They requested six months for these issues to be resolved, and Poka Lambro gave them 90 days.
- ◆ 3/15/00 – Letter received from APTIS requesting that we file for the 90 day extension, effective March 15, 2000, on the FCC Requirement for Truth in Billing. Poka Lambro should receive in approximately one week a detailed requirements document, to ensure that APTIS is performing the development necessary for Poka Lambro to comply.

**VALLEY TELEPHONE COOPERATIVE, INC.
COPPER VALLEY TELEPHONE, INC.**

Valley Telephone Cooperative, Inc. ("Valley") and Copper Valley Telephone, Inc. ("Copper Valley") ("Petitioners") provide exchange and exchange access services to approximately 2,756 access lines in Arizona and approximately 1,488 access lines in New Mexico (Valley), and to approximately 4,819 access lines in Arizona (Copper Valley). As a telephone cooperative, Valley provides end user billing services to its members/owners. Valley is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioners provide billing and collection services for third party providers, including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioners utilize Martin & Associates for the provision of end user billing software. Petitioners have made frequent periodic contacts with their billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and have made reasonable and good-faith efforts to ensure that Martin & Associates would be taking all necessary steps to ensure that the software upgrades and modifications to their end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 7, 2000 that Martin & Associates indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioners to assess what TIB compliance issues remained. Despite the Petitioners' reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioners' control.

Based on the information that Martin & Associates has provided to date, Petitioners request the following waivers for the time periods noted.

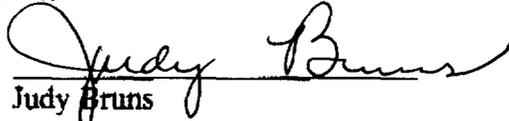
<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000

Until the requested waiver expires, the Petitioners will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF JUDY BRUNS

I, Judy Bruns, Chief Executive Officer/General Manager of Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. ("Petitioners"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioners is true and accurate to the best of my knowledge, information, and belief.

Date 3/20/00



Judy Bruns

Chief Executive Officer/General Manager

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. Truth-In-Billing Documentation

- 10/14/99 Martin & Associates Software Announcement 99-014 received regarding Truth in Billing. Printed bill samples to verify compliance with (1) name of the service provider associated with each charge must be clearly identified on the bill and (2) where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider. These were both in compliance with the exception of the primary vs. sub-cic issue. At this time, M&A has interpreted that identifying by primary cic is sufficient to be in compliance with the ruling. Item (3) include with charges a brief, clear, description of the services rendered requires us, along with M&A staff, to re-format our local service page layout.
- 10/22/99 Contacted M&A to obtain firm date we would receive release tape to accommodate (4) toll-free number for customer inquiry. Response was "should receive tape after the 1st of Nov".
- 10/27/99 Internal memo to CEO/GM expressing desire to file for an extension due to the late release of the tape, M&A User-Group meeting being held the beginning of Nov., and closing on the 9th for our mid-month cycle for Copper Valley.
- 11/03/99 Filed Petition for Temporary Limited Waiver.
- 11/13/99 Internal memo from CEO/GM inquiring as to status of Truth in Billing.
- 11/16/99 Reviewed Martin & Associates Software Announcement 99-014A dated November 12, 1999. In the announcement they stated there was industry confusion as to who the inquiry contact was - primary or sub cic, also they would be reviewing this for future enhancements and if your company considers this to be a major concern you should make sure a waiver is being filed by you or a representative organization which would grant you reprieve for this specific part of the TIB.
- 11/19/99 Filed supplemental letter due to new information from M&A.
- 01/03/00 Received Client Memo M&A 00-003 from Martin & Associates advising of the FCC order requiring carriers not in compliance to have billing inserts stating so.
- 02/14/00 E-mail to M&A inquiring as to:
(1) the anticipated delivery date of the software upgrade necessary for full TIB compliance,
(2) the amount of testing that will have been completed prior to delivery of the software,
(3) the amount of on-site testing they anticipated would be required and
(4) if the software release would include enhancements to deal with the primary vs. sub-cic controversy.
- 02/14/00 Received e-mail back from M&A with "answers":
(1) "We don't have a scheduled release at this time".
(2) "We intend to test this in house and at beta site(s) prior to mass release.....part of this will also be determined by the AOS providers supplying the module information. They are planning to have available March 15th."
(3) "There shouldn't be much testing, however, there will be some table set up required. I would suggest that you plan to give yourself an extra day when you bill the first time."

- (4) "We have received the information from the AOS providers. The sub cic's will be loaded into the software.....the sub cic will show as the carrier, which it is supposed to and the primary carrier will be the contact."

02/15/00 Received memo from Independent Neca Services announcing the OBF recommendation of using a 002-B module for sending sub-cic codes and the adoption of the 020-A module as the industry standard for identification of new service providers.

02/16/00 E-mailed M&A to make sure our software would allow for the non-truncated modules that would be sent beginning March 15th. They responded the software would be capable of accepting and processing.

02/17/00 Received M&A Software Announcement 00-023 regarding TIB status.

03/01/00 Contacted Dave @ M&A inquiring if AT&T would also be submitting the 020-A record. Also asked how the programming was going on sub-cic. He was not sure when it would be complete. His interpretation of the ruling was if our bills were in the customer's possession by April 1st, we did not have to comply for that cycle. We close our billing approximately 2-3 days before the cycle date, but I wasn't sure if the bills would get to the sub by then. Also, there was still the issue with Copper Valley being able to comply by the 15th and if M&A would be able to comply by then. He felt sure they would, but I did not feel his same confidence.

03/06/00 Tried to contact Dave from M&A. He was out of the office, so I spoke with Haven in billing support. I explained our regulatory attorney's interpretation of the ruling and that we needed to have the release tape prior to April 1st. He discussed the issues with someone else @ M&A and again, their interpretation is the system has to be in place by April 1st (on our system, not necessarily used). When I asked for the expected download date so I could file for the appropriate extension, he stated "there are no exact dates".

03/07/00 Intenal conference with Valley staff regarding TIB requirements and the length of extension needed to allow adequate time for complete compliance.

CERTIFICATE OF SERVICE

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that a copy of the foregoing "Petition for Temporary, Limited Waiver" was served on this 21st day of March by hand delivery to the following parties:



Shelley Davis

Lawrence Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
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Washington, DC 20554

Carol Matthey, Deputy Chief
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