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March 27, 2000

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED

MAR 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: In the Matter of Truth-in-Billing and Billing Format ("TIB")
CC Docket No. 98-170
Supplement to March 21, 2000 Petition for Temporary, Limited Waiver

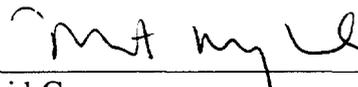
Dear Ms. Salas:

The Petitioning Local Exchange Companies ("Petitioners") that filed a Petition for Temporary, Limited Waiver on March 21, 2000 (or those included in the various Supplements thereto)¹ in the above-captioned proceeding² hereby file this Supplement to provide additional information regarding their contacts with their respective billing system software vendors concerning TIB. (See Attached).

Respectfully submitted,

The Petitioning Local Exchange Companies

By



David Cosson
Thomas J. Moorman
Margaret Nyland

Attachments

¹ Armstrong Telephone Company - Maryland, Armstrong Telephone Company - New York, Armstrong Telephone Company - North, Armstrong Telephone Company - Northern Division, Armstrong Telephone Company - Pennsylvania, Armstrong Telephone Company - West Virginia, Colorado Valley Telephone Cooperative, Inc., Deerfield Farmers' Telephone Company, Valley Telephone Cooperative, Inc., and Copper Valley Telephone, Inc.

² In the Matter of Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-170, FCC 99-72, released May 11, 1999, 64 Fed. Reg. 34488 (June 25, 1999); Errata, CC Docket No. 98-170, DA 99-2092, released October 6, 1999.

No. of Copies rec'd 074
List A B C D E

Armstrong Telephone Company - Maryland
Armstrong Telephone Company - New York
Armstrong Telephone Company - North
Armstrong Telephone Company - Northern Division
Armstrong Telephone Company - Pennsylvania
Armstrong Telephone Company - West Virginia

Armstrong Truth in Billing (TIB) Compliance

The following is the documented chronology of the material we have in our Truth in Billing files:

1. June 10, 1999. E-mail from APTIS in response to our questions. APTIS was sure the TIB rules were being adhered to but they would review internally to confirm.
2. July 6, 1999. Began a series of internal e-mails to APTIS discussing this issue. The general conclusion was that the APTIS's software was not in compliance.
3. July 12, 1999. E-mail officially requesting that Armstrong be included on the APTIS schedule for TIB development. In addition, Armstrong requested a copy of the development schedule. Received response from APTIS same day asking for specifications.
4. July 15, 1999. E-mail from APTIS acknowledging the need for change and requesting specifications along with internal responses that the TIB had been delayed until September 1999.
5. October 15, 1999. E-mail from APTIS requesting specifications.
6. December 10, 1999. Internal e-mail with our interpretation of our compliance or development needs.
7. December 16, 1999 Pilot Tracking Form Corporate # 20. Project request to APTIS including a copy of TIB rules. E-mailed detailed specifications to APTIS.
8. January 17, 2000. E-mail to APTIS requesting an update on the TIB request and requesting a conference call.
9. January 28, 2000. E-mail from APTIS requesting our comments on an internal APTIS e-mail on Modification 21276 (TIB).
10. January 31, 2000. E-mail from Armstrong responding and requesting a conference call between Armstrong and the APTIS development team.
11. February 3 to 16, 2000. Several more bulletins on TIB.
12. February 9, 2000. Conference call with APTIS to discuss requirements.
13. February 10, 2000. Package of TIB documents sent overnight to APTIS.
14. February 17, 2000. E-mail to APTIS alerting them to additional TIB requirements.
15. February 23, 2000. Conference call with APTIS to discuss additional requirements.
16. February 24, 2000. First requirements document received from APTIS.
17. March 1, 2000. Conference call with APTIS to discuss the 2-24-00 requirements document and further clarify the additional requirements.
18. March 1 – 14, 2000. Series of telephone calls and e-mails requesting firm time frame commitment and letter stating such, finalization of specs, and top priority for this project.

**The Armstrong Telephone Group of Companies
Identification of Persons
Listed on Documentation**

Armstrong Telephone Group of Companies

Barb Direnzo
John Eriksen
Jim Krenicky
Jim Margaria
Roslyn Thony
Mike Visconti

APTIS

Karen Balfe
Ruth Candelario
Tom Horn
Troy Krause

North Pittsburgh Telephone Company

Norm Carpenter
Greg Sloan

Eriksen, John

From: Michelle Bramich [MBRAMICH@commsoft.net]
Sent: Thursday, June 10, 1999 5:01 PM
To: John Eriksen
Cc: Barbara Direnzo; Troy Krause
Subject: RE: Some Help

John,

Please refer to my responses inserted below.

I will contact you in the morning.

Thanks,

Michelle~

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

From: Eriksen, John [SMTP:jeriksen@agoc.com]
Sent: Thursday, June 10, 1999 10:43 AM
To: 'mbramich@commsoft.net'
Cc: Direnzo, Barbara
Subject: Some Help

Michelle, three things I need some help on in Troy's absence to keep things moving: I am faxing the material to you.

1. ATT call excluded from minimum charges?

[Michelle Bramich] We do have a field in the call plans where we can fill out a minimum charge amount. The system will handle this. For example, if the min. charge is \$7.50 and the customer only uses \$5.00, the system will calculate the difference of \$2.50 and charge the customer.

My question to you is who and why would you be excluding this minimum charge?

Do these customers have any common criteria, such as certain business customers or some other type of common exempt customers? If this is the case, we can set up another call plan with the minimum charge waived. I do not believe we can keep simply one plan and sometimes charge some customers and not charge others. The need for an additional call plan will be needed.

2. A new bill print requirement from the FCC which is now applicable to small companies.

[Michelle Bramich] I spoke to Bob about this one. He was positive that we already adhere to these new rules, b/c N.PITT has to conform to these rules as well. I will forward these rules onto your bill print programmer just as an FYI for him. I will find out from Troy who is working on your bill print.

3. A test case from our conference room pilot where we are getting a field numeric error for a SS# entry?

[Michelle Bramich] In the example you faxed to me with this problem, there is one number missing from the SSN. This would definitely cause the error message you are receiving. If you have entered all 9 numbers and are still getting this message, please let me know.

Thanks for your help. How's it going?

Eriksen, John

From: Norm Carpenter [normc@nptc.com]
Sent: Wednesday, July 07, 1999 4:20 PM
To: 'Eriksen, John'
Cc: Greg Sloan; Lynn Scuillo; jmargaria@agoc.com
Subject: RE: Request

Billing Concepts "may" have a different interpretation of the word "truth".

We just recently sent them the FCC requirements and stated that we expect them to be in compliance. Currently, I am not aware of any process within CommVergence bill print that notifies the customer when a carrier change is made and appropriate instructions for the customer to contact the new carrier for disputes, etc.

You can confirm with Greg Sloan, but I doubt if they are already in compliance with the new regulations.

Norm Carpenter
Service Manager
North Pittsburgh Telephone Company
normc@nptc.com
Voice: 724.443.9581
Fax: 724.443.3299

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

From: Eriksen, John [SMTP:eriksen@agoc.com]
Sent: Wednesday, July 07, 1999 3:57 PM
To: 'Norm Carpenter'; Eriksen, John
Cc: Eileen Kudlock; Lynn Scuillo; Margaria, Jim
Subject: RE: Request

Norm, I get some dates and time to you by end of day tomorrow.

Also, I received a copy of an FCC notice for "truth in billing rules" effective 7-25-99 from Barb. When I contacted Billing Concepts, they said they were doing for you and the bills were in compliance. Is this true?

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

From: Norm Carpenter [SMTP:normc@nptc.com]
Sent: Wednesday, July 07, 1999 7:07 AM
To: 'Eriksen, John'
Cc: Eileen Kudlock; Lynn Scuillo
Subject: RE: Request

Give me some suggested dates and times.

Norm Carpenter
Service Manager
North Pittsburgh Telephone Company
normc@nptc.com
Voice: 724.443.9581
Fax: 724.443.3299

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

From: Eriksen, John [SMTP:eriksen@agoc.com]

Sent: Tuesday, July 06, 1999 4:44 PM
To: 'Norm Carpenter'; Eriksen, John
Cc: Eileen Kudlock; Lynn Scullo; Margaria, Jim
Subject: RE: Request

Norm, our questions are primarily in the area of payment application to the aged buckets and how the money is applied. We are testing this right now and will have some specific questions by end of week. Would it be possible to have a conference call next week of an hour or so that way we would not take to much of her time?

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

From: Norm Carpenter [SMTP:normc@nptc.com]
Sent: Tuesday, July 06, 1999 2:43 PM
To: 'Eriksen, John'
Cc: Eileen Kudlock; Lynn Scullo; jmargaria@agoc.com
Subject: RE: Request

John,

Eileen does not have the time this week to spend with Armstrong. Perhaps you could summarize your questions/concerns and we could respond.

We still have many conversion problems in the credit/payment processing area and it is crucial that Eileen devote her time to correcting those problems. In addition, she has some well earned vacation scheduled and will not be available then.

Norm Carpenter
Service Manager
North Pittsburgh Telephone Company
normc@nptc.com
Voice: 724.443.9581
Fax: 724.443.3299

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

From: Eriksen, John [SMTP:jeriksen@agoc.com]

Sent: Tuesday, July 06, 1999 11:06 AM
To: 'normc@nptc.com'
Cc: Margaria, Jim; Direnzo, Barbara
Subject: Request
Importance: High

Norm, I understand there are a number of problems
with
Chapter
63/64
and my
conversation with Billing Concepts on Friday were not
encouraging.
I
did
talk to Eileen and she was very helpful. Would it be
possible
for
her
to
come up to Armstrong some afternoon this week to go
over
the
entire
process?
I will have our CSR and Barb Direnzo available to
discuss
with
her
and
have
her walk us through the process. Thursday afternoon
this
week
is
best
for
us. This would be a great help to us and we appreciate
NPTC's
assistance as
our time frames are short. Please let me know. Thanks.

Eriksen, John

From: Eriksen, John
Sent: Monday, July 12, 1999 3:58 PM
To: Margaria, Jim; Drenzo, Barbara
Subject: FW: FCC Truth In Billing Principals

Importance: High

FYI. What do we do next?

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

From: Norm Carpenter [SMTP:normc@nptc.com] <mailto:[SMTP:normc@nptc.com]>
Sent: Monday, July 12, 1999 3:41 PM
To: 'Eriksen, John'
Cc: Lynn Scuillo; jmargaria@agoc.com
Subject: RE: FCC Truth In Billing Principals

John,

Ask them how they indicate "a clear and conspicuous notification of any change in service provider, including notification to the customer that a new provider has begun providing service."

Ask them if in the Descriptions of Billed Charges if the charges are accompanied by a brief, plain language description of the service or services rendered. Is their description sufficiently clear and specific so that customers can accurately assess that the services for which they are billed correspond to those that they have requested and received and that the cost assessed for those services conform to their understanding of the price charged?

Clear and conspicuous disclosure of inquiry contacts is also a requirement. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's account and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number. I interpret that to mean that each AOS carrier must have a toll-free number printed on the bill for customer reference. Each LEC cannot resolve the complaint as a billing agent because the LEC will not have rating information, etc.

These requirements cannot be tailored to each CommVergence user but must be a part of their overall bill print product. I don't really see any other way around it.

If CommVergence is not deemed in compliance and the LEC using the product is fined by the FCC, who will pay the fine? I'm sure that AGOC will be more than happy to step up to the plate and take the lumps for their billing vendor who is not in compliance with FCC regulations!

Again, not to sound like a broken record, but this issue is more involved than interpretation! I think more is at stake than Billing Concepts realizes. Who is their federal regulatory guru? For that matter, who is the PA state regulatory guru? Who tracks these issues within their organization and ensures compliance?

Norm Carpenter
Service Manager
North Pittsburgh Telephone Company
normc@nptc.com
Voice: 724.443.9581
Fax: 724.443.3299

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

> **From:** Eriksen, John [SMTP:jeriksen@agoc.com] <mailto:[SMTP:jeriksen@agoc.com]>

> **Sent:** Monday, July 12, 1999 3:29 PM

> **To:** Margaria, Jim; Drenzo, Barbara; 'normc@nptc.com';

> 'miscuill@nptc.com'

> **Subject:** FW: FCC Truth In Billing Principals

>

> FYI.

>

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

> From: Troy Krause [SMTP:TKRAUSE@commsoft.net] <mailto:[SMTP:TKRAUSE@commsoft.net]>

> <mailto:[SMTP:TKRAUSE@commsoft.net] <mailto:[SMTP:TKRAUSE@commsoft.net]>>

> Sent: Monday, July 12, 1999 2:23 PM

> To: John Eriksen

> Subject: RE: FCC Truth In Billing Principals

>

> John,

>

> Truth in Billing Principals is really just a matter of your

> interpretation.

> Currently, all companies that are not well known as are AT&T etc...

> are

> lumped into one total. As I understand Truth in Billing Principals,

> you

> will want to break that total out so that your customers can see

> clearly

> what they are being billed for.

> Let me know what it is you want to see, and we can break out the

> totals etc.

> Your bill print program will be available (so I'm told) by the end of

> the

> week so that you can run samples. Those samples will need to be

> reviewed as

> carefully as possible. One thing to review would be this subject so

> that

> you can let us know what needs to be broken out.

> As for NPTC, they need to do the same thing and Bob is aware of the

> situation.

> Troy A Krause

> Aptis...a subsidiary of Billing Concepts

> 518-433-7694

> troy.krause@aptissoftware.com <<mailto:troy.krause@aptissoftware.com>>

>

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

> From: Eriksen, John [SMTP:jeriksen@agoc.com] <mailto:[SMTP:jeriksen@agoc.com]>

> <mailto:[SMTP:jeriksen@agoc.com] <mailto:[SMTP:jeriksen@agoc.com]>>

> Sent: Monday, July 12, 1999 9:25 AM

> To: 'tkrause@commsoft.net'

> Cc: 'rwarreb@commsoft.net'; Drenzo, Barbara; Margaria, Jim

> Subject:FCC Truth In Billing Principals

> Importance: High

>

> Troy, I am following up on a request sent to you on June 10, 1999 on

> this

> subject. I understand you also received a request from NPTC on the

> same

> issue. I understand CommVergence is not in full compliance. Please

> accept

> this as our request to be added to the NPTC request. What is the

> planned

> development schedule?

Eriksen, John

From: Direnzo, Barbara
Sent: Friday, July 23, 1999 12:36 PM
To: Eriksen, John
Subject: RE:

I believe this has been delayed until Sept. Frankly, with the FCC, it could be delayed again. I would put the request in, but in the grand scheme of things, the change will take a back seat to other issues.

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

From: Eriksen, John
Sent: Friday, July 23, 1999 11:29 AM
To: Margaria, Jim
Cc: Direnzo, Barbara
Subject: FW:

Jim, what ever happened on this issue?

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

From: Karen Balfe [[SMTP:kbalfe@commsoft.net](mailto:kbalfe@commsoft.net)] <[mailto:\[SMTP:kbalfe@commsoft.net\]](mailto:[SMTP:kbalfe@commsoft.net])>
Sent: Thursday, July 15, 1999 8:48 AM
To: Connie Ondola; Stacia Sims; Kim Christman; Jan Jackson; Tim Brown; Linda Barley; Bill Pawlowski; Beth Davis; Keith Wadley; Norm Carpenter; John Eriksen
Cc: Missy Frenyea; Laura Knussman; Sara Prudhomme; Ruth Candelario
Subject:

Good morning, everyone,

The FCC has new Truth in Billing regulations that govern the way telecommunications companies present certain information on their bill prints. You can view information on this set of regulations by clicking on the following link:

<http://www.fcc.gov/ccb/enforce/truthinbilling.html>

<<<http://www.fcc.gov/ccb/enforce/truthinbilling.html>>>

Some of you have already submitted issues to us regarding these regulations, while we have not heard from others. What we ask is that you review the Truth in Billing regulations and determine what changes you feel are needed (if any) on your bill prints, and submit a request to Patios for those changes. The changes will be implemented on a first come, first serve basis.

Each of you has a unique bill print, and you may feel that there are changes or that there are not changes required to comply with this legislation, which is why we are asking you to identify what work you feel needs to be done. For those of you who have submitted requests, the Business Analysts on the Interfaces team may be calling you for more information as to what you feel needs to be done.

Please Note: Any modifications that you request be made to custom code - such as your bill print - to comply with this regulation are billable modifications. Changes to the core CommVergence modules (i.e. non-custom code) to comply with this regulation are not billable.

Thank you for your time,

Karen

Karen Balfe
Manager, Requirements & Product Analysis
Aptis (a subsidiary of Billing Concepts, Inc.)
karen.balfe@billingconcepts.com

<<<mailto:karen.balfe@billingconcepts.com>>>

1388414@skytel.com <<<mailto:1388414@skytel.com>>>

Eriksen, John

From: Troy Krause [TKRAUSE@commsoft.net]
Sent: Friday, October 15, 1999 4:32 PM
To: John Eriksen
Subject: RE: FCC 'Truth In Billing Requirements'

What do you want to see on the bill print? We will need to know what you want to print as part the FCC ruling.

Troy Krause
APTIS...a subsidiary of Billing Concepts
518-433-7694
troy.krause@aptissoftware.com

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

From: Eriksen, John [SMTP:jeriksen@agoc.com]
Sent: Thursday, October 14, 1999 10:13 AM
To: 'tkrause@commsoft.net'
Cc: Direnzo, Barbara; Margaria, Jim
Subject: FCC 'Truth In Billing Requirements'
Importance: High

Troy, sometime in July 1999 we and NPTC questioned Bob Warren on APTI's plans to comply with this ruling. We eventually received an e-mail from Karen Balfe and have since then not heard of the status of this request. We now understand the FCC has a 11-12-99 implementation date and ours and others bills are not in compliance. Please let us know what the status is. Thanks.

Eriksen, John

From: Eriksen, John
Sent: Friday, October 15, 1999 8:36 AM
To: Direnzo, Barbara; Margaria, Jim
Subject: FW: TRUTH IN BILLING REQUIREMENTS

FYI. Per Norm the major requirements have been delayed until April 1, 2000. NPTC has submitted separate requirements. I am trying to get a copy of their requirements so we can piggyback and save some time. Then we need to confirm and send our own set of specifications. I will keep you posted.

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

From: Eriksen, John
Sent: Thursday, October 14, 1999 3:12 PM
To: 'Greg Sloan'; Norm Carpenter; Eriksen, John
Cc: Lynn Scuillo; Margaria, Jim
Subject: RE: TRUTH IN BILLING REQUIREMENTS

Greg, can you summarize you modifications for me. I believe ours should be the same and if we can avoid confusion at APTIS this would be helpful to us. Thanks for the help.

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

From: Greg Sloan [SMTP:gdsloan@nptc.com] <<mailto:SMTP:gdsloan@nptc.com>>
Sent: Thursday, October 14, 1999 3:02 PM
To: Norm Carpenter; 'Eriksen, John'
Cc: Lynn Scuillo
Subject: RE: TRUTH IN BILLING REQUIREMENTS

FYI:

We submitted our modification requests (to comply with Truth-In-Billing) to Aptis some time ago. We got quotes back on all of those mod requests. Signed off on them. And returned them to Aptis. Our modifications are TENTATIVELY scheduled to be finished before the end of this year.

Questions?

Greg

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

> **From:** Norm Carpenter
> **Sent:** Thursday, October 14, 1999 10:41 AM
> **To:** 'Eriksen, John'
> **Cc:** Lynn Scuillo; Greg Sloan
> **Subject:** RE: TRUTH IN BILLING REQUIREMENTS

>

> John,

>

> The FCC has delayed, until April 1, 2000 (don't you love that date), the effective date for compliance with certain Truth-in-Billing rules.
> Specifically, the requirement that carriers highlight new service providers (64.2001(a)(2)) on their bills, and the requirement that carriers identify deniable and non-deniable charges (64.2001(c)). All other principles and guidelines adopted in the April 15, 1999 Order will become effective 30 days after Federal Register publication of notice of the effective date.

>

> There was a conference call but the result of that is basically each company has to submit their requirements since Aptis contends that each bill print is customized for each client.

>
> NPT has prepared it's requirements and to my knowledge submitted them to
> Aptis.
>
> Norm Carpenter
> Service Manager
> North Pittsburgh Telephone Company
> normc@nptc.com
> Voice: 724.443.9581
> Fax: 724.443.3299
>
> -----Original Message-----
> From: Eriksen, John [[SMTP:jeriksen@agoc.com](mailto:jeriksen@agoc.com)] <[mailto:\[SMTP:jeriksen@agoc.com\]](mailto:[SMTP:jeriksen@agoc.com])>
> Sent: Thursday, October 14, 1999 10:05 AM
> To: 'normc@nptc.com'
> Cc: Margaria, Jim; Direnzo, Barbara; 'mlscuill@nptc.com'
> Subject: FW: TRUTH IN BILLING REQUIREMENTS
>
> Norm or Lynn, can you help me on this with the latest you know from
> APTIS.
> The latest information in my file indicates this ruling was delayed
> until
> SEPT. then NOV. I understand there was to be a joint conference call
> with
> APTIS to respond to an e-mail from Karen Balfe of APTIS . I was on
> my way
> out of town to one of our installations. Did the call ever occur and
> did we
> ever jointly submit requirements?
> -----Original Message-----
> From: Direnzo, Barbara
> Sent: Thursday, October 14, 1999 9:37 AM
> To: Eriksen, John
> Cc: Margaria, Jim
> Subject: TRUTH IN BILLING REQUIREMENTS
>
> There are certain Truth-In-Billing Rules that become effective on
> November
> 12, 1999. The ones that we have trouble with is:
>
> The name of the service provider must be clearly
> identifiable on the
> bill.
> Carriers must display a toll-free number on each bill.
>
> We need to have the carriers name appear on the bill for the AOS
> providers
> along with their 800 number. This is still not happening, and if
> its not
> happening come 11/12/99, we are in violation of the FCC rules.
>
> We need to talk with APTIS and find out where they are on this.
> We're not
> the only ones that need this.
>
> Thanks,
> Barb Direnzo

Eriksen, John

From: Drenzo, Barbara
Sent: Friday, December 10, 1999 9:14 AM
To: Eriksen, John
Subject: TRUTH IN BILLING REQUIREMENTS

- #1. There for AT&T, MCI, Sprint and Armstrong. All other carriers are being shown as Alternate Operator Services, with the CIC code only being displayed on the customer's bill.
- #2. Already there, we separate carriers on separate pages.
- #3. I believe this is the description that is provided by the carriers on the customer's bill.
- #4. We need to place an 800 number along with the carriers name. I thought we would be able to put the number in the carrier table so that when the name was pulled, the number would come with it.
- #5. This is getting trickier. We need to display the date of a change in carrier with a notification that a new provider has begun to provide service. This would have to be triggered during a PIC change.
- #6. I believe this is already handled with the 900 disclosure. For non-payment of toll, the customer would lose toll, for non-payment of local the customer would lose local, but the 900 non-payment cannot be used to suspend any services and I believe the 900 message indicates that.

Barb Drenzo

TIB RULES

The TIB rules (effective November 12, 1999, absent waiver) require the following:

The name of the service provider associated with each charge must be clearly identified on the bill;

where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider;

charges must be accompanied by a brief, plain language description of the service or services rendered. The description must be sufficiently clear and specific so that customers can accurately assess that the services for which they are billed correspond to those that they have requested and received, and that the cost assessed for those services conform to their understanding of the price charged; and

telephone bills must contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, on the bill. Carriers must prominently display on each bill a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's account and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number.

The TIB rules (effective April 1, 2000) require the following:

telephone bills must provide clear and conspicuous notification of any change in service provider, including notification that a new provider has begun providing service; and

where a bill contains charges for basic local service, in addition to other charges, the bill must distinguish 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. The carrier must explain this distinction to the customer, and must clearly and conspicuously identify on the bill those charges for which non-payment will not result in disconnection of basic, local service.

Eriksen, John

From: Eriksen, John
Sent: Thursday, December 16, 1999 10:36 AM
To: 'tkrause@commsoft.net'
Cc: Direnzo, Barbara; Margaria, Jim
Subject: PTF CORP 20 Truth In Billing Requirements

Importance: High

Troy as requested the following are our requirements. I have faxed a PTF with a document attached that gives more detail. The numbers on this e-mail correspond to the same numbers on the faxed document.

1. Therefore we need to print BELL, AT&T, MCI and Armstrong. All other carriers are shown as AOS-Alternate Operator Services with the CIC code printed on the customers bill.
2. This is already being done.
3. This is already being done.
4. We believe we can put the carriers toll free number in the description portion of the Carrier Table and it will print on the bill. Please confirm.
5. We believe this primarily applies to Toll , an example being PIC change but possibly others.
6. We believe we are in compliance with our 900 number disclosure.

We need to know what software changes APTIS has made to date to implement these changes along with any additional changes needed. Also a testing and release schedule needs to be determined. We also have some concerns with the bill print programs and any changes required in these programs. Per the rules these changes are needed by 4-1-2000.

Once you have investigated we would like to schedule a conference call to confirm the specifications. Please let me know.

PILOT TRACKING FORM

CUSTOMER ACCOUNTS AND LINE & EQUIPMENT

Control # (Start with 1)
CORP-20

Prepared by: John ERIKSEN

Date 12-16-99

<u>Module</u>	<u>Screen View</u>		<u>DataBase</u>
<input type="checkbox"/> Application	<input type="checkbox"/> Green Screen	<input checked="" type="checkbox"/>	Rising Sun Production (COMDBATMD) <input type="checkbox"/> Rising Sun Training (COMTRNATMD)
<input checked="" type="checkbox"/> Service Order	<input type="checkbox"/> GUI	<input checked="" type="checkbox"/>	Harrisville Production (COMDBATND) <input type="checkbox"/> Harrisville Training (COMTRNATND)
<input type="checkbox"/> Trouble Tickets		<input checked="" type="checkbox"/>	Duke Center Production (COMDBATNO) <input type="checkbox"/> Duke Center Training (COMTRNATNO)
<input type="checkbox"/> Payments		<input checked="" type="checkbox"/>	Addison Production (COMDBATNY) <input type="checkbox"/> Addison Training (COMTRNATNY)
<input checked="" type="checkbox"/> Billing		<input checked="" type="checkbox"/>	Clinton Production (COMDBATPA) <input type="checkbox"/> Clinton Training (COMTRNATPA)
<input type="checkbox"/> Line Equipment		<input checked="" type="checkbox"/>	Hamlin Production (COMDBATWV) <input type="checkbox"/> Hamlin Training (COMTRNATWV)
<input checked="" type="checkbox"/> Toll Processing			<input type="checkbox"/> Other (Parallel, Test, etc.)
<input type="checkbox"/> Inquiry			
<input checked="" type="checkbox"/> Other <u>As Needed</u>			

Were you able to enter this item into CommVergence?

YES NA.
NO _____

Record below any problems associated with processing this item in the CommVergence system. Explain the item that caused the problem and give a brief explanation of what you were trying to accomplish. Do a screen print and then copy any report, bill or other documentation associated with the problem. Also indicate the path taken to that screen and attach to this form. Fax to John in Butler at 724-283-1420.

See attached requirements for Truth in Billing Rules.

In case of Service Order:

1) Were you able to successfully bump to the next status? NA
2) What status is the order in now? NIF

Attach screen prints and copies of Service Order, Trouble Ticket, Payment Screen, L&E form and any other documents you believe necessary. Keep a complete set for your records.

Supervisor Sign Off John Eriksen

Date 12-16-99

Eriksen, John

From: Eriksen, John
Sent: Monday, January 17, 2000 10:25 AM
To: Eriksen, John; 'tkrause@commsoft.net'
Cc: Direnzo, Barbara; Margaria, Jim; Thony, Roslyn; 'rwarren@commsoft.net'; Macko, JoEllen
Subject: RE: PTF CORP 20 Truth In Billing Requirements

Importance: High

Troy, we need to know the status of this request. These items are required to be completed by 4-1-00 by the FCC. We want to begin testing 3-1-00 as there will be a number of changes to the bill print programs. I would like to schedule a conference call this week to review the status. Please let me know.

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

From: Eriksen, John
Sent: Thursday, December 16, 1999 10:36 AM
To: 'tkrause@commsoft.net'
Cc: Direnzo, Barbara; Margaria, Jim
Subject: PTF CORP 20 Truth In Billing Requirements
Importance: High

Troy as requested the following are our requirements. I have faxed a PTF with a document attached that gives more detail. The numbers on this e-mail correspond to the same numbers on the faxed document.

1. Therefore we need to print BELL, AT&T, MCI and Armstrong. All other carriers are shown as AOS-Alternate Operator Services with the CIC code printed on the customers bill.
2. This is already being done.
3. This is already being done.
4. We believe we can put the carriers toll free number in the description portion of the Carrier Table and it will print on the bill. Please confirm.
5. We believe this primarily applies to Toll , an example being PIC change but possibly others.
6. We believe we are in compliance with our 900 number disclosure.

We need to know what software changes APTIS has made to date to implement these changes along with any additional changes needed. Also a testing and release schedule needs to be determined. We also have some concerns with the bill print programs and any changes required in these programs. Per the rules these changes are needed by 4-1-2000.

Once you have investigated we would like to schedule a conference call to confirm the specifications. Please let me know.

Eriksen, John

From: Troy Krause [troy.krause@aptissoftware.com]
Sent: Friday, January 28, 2000 9:02 AM
To: 'jeriksen@agoc.com'
Cc: 'rthony@agoc.com'
Subject: FW: MOD21276

John,

To ensure that the changes to truth in billing take place before the 7.0 release, please comment on the email below ASAP

Thanks

Troy Krause
APTIS...a subsidiary of Billing Concepts
518-433-7694
troy.krause@aptissoftware.com

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

From: Troy Krause
Sent: Wednesday, January 26, 2000 1:27 PM
To: 'jeriksen@agoc.com'
Subject: FW: MOD21276

John,

Can you comment on the underlined portion of the email below?

Thanks

Troy Krause
APTIS...a subsidiary of Billing Concepts
518-433-7694
troy.krause@aptissoftware.com <<mailto:troy.krause@aptissoftware.com>>

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

From: Tom Horn
Sent: Wednesday, January 26, 2000 9:32 AM
To: Troy Krause
Subject: RE: MOD21276

It doesn't look like a problem. The only part I don't understand is underlined - so no guarantee until I know. I probably will later today, unless you can shed some light.

1. The name of the service provider associated with each charge must be clearly identified, therefore they need to print Bell, AT&T, MCI or Armstrong. All other carriers are shown as AOS with the CIC Code printed on the customer's bill.
2. Telephone bills must provide clear and conspicuous notification of any change in service provider, therefore they want PIC changes that relate to Toll to display Do we have a DWI to your knowledge?

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

From: Troy Krause
Sent: Monday, January 24, 2000 4:22 PM

To: Tom Horn
Subject: FW: MOD21276

Tom,

Have you had a chance to look into this?

Troy Krause

APTIS...a subsidiary of Billing Concepts

518-433-7694

troy.krause@aptissoftware.com <<mailto:troy.krause@aptissoftware.com>>

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

From: Troy Krause
Sent: Tuesday, January 18, 2000 10:17 AM
To: Tom Horn
Subject: FW: MOD21276

Tom,

Is it possible to have this MOD request completed by 03/01 and sent to Armstrong. They need to have it in place by April 1,2000 and would like to test it out before that time.

Please advise.

Thanks

Troy Krause

APTIS...a subsidiary of Billing Concepts

518-433-7694

troy.krause@aptissoftware.com <<mailto:troy.krause@aptissoftware.com>>

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

From: Ruth Candelario
Sent: Tuesday, January 18, 2000 10:16 AM
To: Troy Krause
Subject: RE: MOD21276

Troy,

That mod is schedule for 7.0. Tom Horn is taking care of bill print issue if you want more details you could contact him.

Ruth N. Candelario
Business Analyst - Interfaces Team
Aptis, A Subsidiary of Billing Concepts
(518) 431-7168

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

From: Troy Krause
Sent: Tuesday, January 18, 2000 9:58 AM
To: Ruth Candelario

| Subject: FW: MOD21276

Ruth,

Can you give me a status of MOD21276?

Thanks

Troy Krause

APTIS...a subsidiary of Billing Concepts

518-433-7694

troy.krause@aptissoftware.com

<<mailto:troy.krause@aptissoftware.com>>

Eriksen, John

From: Ruth Candelario [ruth.candelario@aptissoftware.com]
Sent: Tuesday, February 15, 2000 1:35 PM
To: John Eriksen
Cc: Tom Horn
Subject: update on Truth in billing issue

Hi John,

Hope everything is fine there. I am still working in the requirement document for the DWI21933-Truth in Billing changes MOD21276. I will be out of the office from tomorrow noon and I will be returning on Monday 21st. I hope to finish this by evening Monday 21st. Please if you have any question contact me before tomorrow noon or if after that then you could contact Tom Horn.

Thanks,
Ruth N. Candelario
Business Analyst - Interfaces Team
Aptis, A Subsidiary of Billing Concepts
(518) 431-7168