

KRASKIN, LESSE & COSSON, LLP
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

March 29, 2000

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

MAR 29 2000
OFFICE OF TELECOMMUNICATIONS

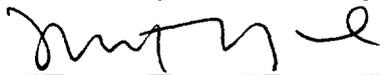
Re: In the Matter of Truth-in-Billing and Billing Format ("TIB")
CC Docket No. 98-170
Supplement to March 21, 2000 Petition for Temporary, Limited Waiver

Dear Ms. Salas:

The Petitioning Local Exchange Companies ("Petitioners") that filed a Petition for Temporary, Limited Waiver on March 21, 2000 in the above-captioned proceeding¹ hereby file this Supplement² to provide additional information regarding the contacts with their 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 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.

² Poka Lambro Telephone Cooperative, Inc. and Poka Lambro Telecommunications, Inc. dba Poka Lambro Telephone Company.

No. of Copies rec'd 044
List ABCDE

Poka Lambro Telephone Cooperative, Inc.
Poka Lambro Telecommunications, Inc.
dba Poka Lambro Telephone Company

APTIS PROGRAM REQUEST FORM

Directions: This form can be used to request programs or program changes. Please complete The form and return it to Aptis Applications Support Department at 7 Southwoods Blvd, Albany, NY 12211-2352. (Fax 518 431-7540)

Part A: Requester Information

Company Name: Poka Lambro Telephone
Date of Request: 01-14-2000
Requested by: Sandra Teaff Department: DP

Customer Tracking Number: POK20000114

Part B: Request Information

Type of Request (please check one of the following):

- Explanation of error message (and adjustment as necessary)*
- Correction of an error in an existing program
- Change an existing program
- Create a program
- Other (please describe) _____

FAX 518 431-1614

* Please submit screen prints. To complete the prints, position the cursor at the error message, and press the **HELP** key (or right-click mouse button). A screen that explains the message is displayed. Print this screen.

In the spaces provided below, please describe additional information on the problem (such as details on when it occurs) or the request. Please attach additional pages as necessary.

Due to changes by the Texas PUC we have need of a T&C for the TRUTH IN BILLING changes and also need changes made to our late notice process. The late notice requirement is effective March 1, 2000. I will attach what information I have available to help you make you accessment. We would appreciate some contact on this as soon as possible since we have a short time frame for implementation. I would appreciate knowing if you have any of the TRUTH in BILLING changes in place for any of you other companys.

Part C: Customer Consent

This form must be signed by a representative of the company requesting program changes or new programs. Work cannot begin on a request for a program change or new program until Aptis has the written consent of such a representative.

Authorized by: Sandra Teaff
Title: DP Manager
Date: 01-14-2000

Sandra Teaff 2216-3

Part D: For Aptis Use Only

Date received: _____
Trouble Ticket #: _____ Assigned to/date assigned: _____
Called in by/date: _____

Summary of Truth-in-Billing Requirements				
	Rule Section	Requirement <i>(Descriptions of requirement are paraphrased— actual rules provide elaboration)</i>	Old Date	New Date
1.	§64.2400	Purpose and Scope.	11/12/99	11/12/99
2.	§64.2401(a)(1) ✓	Bill Organization-Service Provider Name. The name of the service provider associated with each charge must be clearly identified on the telephone bill.	11/12/99	4/1/00*
3.**	§64.2401(a)(2) ✓	Bill Organization-Multiple Carriers. When charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider.	11/12/99	4/1/00*
4.**	§64.2401(a)(2)	Bill Organization-New Service Providers. Clear and conspicuous notification of new service providers.	4/1/00	4/1/00
5.	§64.2401(b) must file	Descriptions of Billed Charges. Charges contained on telephone bills must be accompanied by a brief, clear, non-misleading, plain-language description of the service or services rendered. (The full text of Section 64.2401(b) defines what the FCC means by " <u>clear</u> ") <i>clarify this</i>	11/12/99	11/12/99
6.	§64.2401(c)	"Deniable" and "Non-Deniable" Charges. When 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 ("Non-Deniable"), and charges for which non-payment will not result in such disconnection ("Deniable").	4/1/00	4/1/00
7.	§64.2401(d) submit	Clear and conspicuous disclosure of inquiry contacts. The billing agent's or aggregator's toll-free number is sufficient as long as they possess sufficient knowledge and authority to resolve customer inquiries and requests for adjustments.	11/12/99	4/1/00*

must file

* For §64.2401(a)(1), the portion of §64.2401(a)(2) requiring separation of multiple carrier charges, and §64.2401(d), the extension until April 1, 2000, applies only when a company's billing software, or that of a company's service bureau, cannot accommodate the particular TIB requirement.

**There are two separate duties prescribed within §64.2401(a)(2).

cover page - Interlata - Intralata
AT&T Title - CFC - Table area

Summary of
what sent
w/1/14/00
doc.

HOME		PUCT 	
Public Utility Commission of Texas			
Office of Customer Protection, Information and Education, 1701 N. Congress, Austin, TX 78701 Fax 512-936-7003			
Contact: Betsy Tyson 512-936-7132		News Release	
Terry Hadley 512-936-7135		July 12, 1999	

PUC Proposes Rules to Protect Customers

Victims of Phone Cramming To Get Help.

The Public Utility Commission (PUC) on Thursday proposed cramming regulations designed to prevent unauthorized telephone charges to customers. Cramming occurs when a telephone customer is billed for products or services that the customer never authorized.

The proposed rules require telephone companies to:

- Make a refund or credit to customers who have paid unauthorized charges.
- Maintain a two-year record of all customers who have received any unauthorized charges.
- Continue phone service to any customer who disputes a bill for unauthorized charges until the dispute is resolved.
- Provide toll-free numbers for customers to contact each billing company.
- Furnish a notice of billing rights to all customers, including the right to file a complaint with the PUC.

The proposed rules allow the PUC to pursue enforcement action, including a penalty against companies which cram telephone customers. In addition, the PUC can demand that companies show all required records and could revoke a company's right to provide telecommunications service if there are repeated violations.

The proposed rules will be published in the Texas Register. Comments may be submitted to the PUC within 30 days after publication. A public hearing on the proposed rules is scheduled for Sept. 21, 1999, at the PUC in Austin. The PUC is expected to adopt final anti-cramming rules later this year.

The PUC encourages competition and customer choice while ensuring electric and telephone operations, services and rates are fair and reasonable.

All PUC News Releases are available at www.puc.state.tx.us

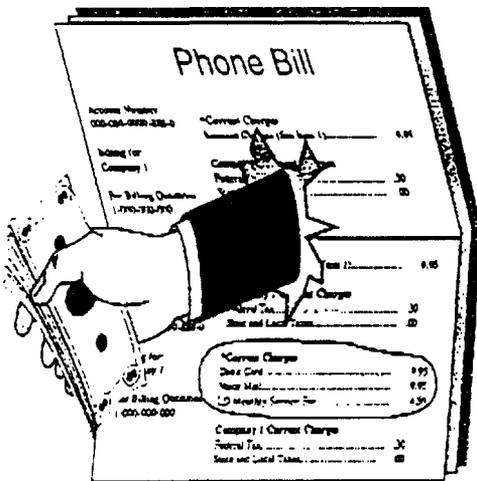


Customer Connection

What You Need To Know About Cramming

You could be paying for services you didn't order and don't want. "Cramming" unauthorized charges on your local phone bill is a fast-growing problem. Sometimes these charges go unnoticed. Sometimes you pay it because it is on your regular monthly telephone bill even though you don't understand why it is there. Or you might pay it because you worry that your credit rating will suffer if you don't. You are not required to pay unauthorized charges.

How to Prevent Cramming



- Read your phone bill carefully. Call the company that is billing you and question any curious charges.
- Never sign anything without reading it thoroughly.
- When you are called by a telemarketer, obtain the name of the solicitor and the purpose of the call before providing your name and any other information.
- Be cautious about leaving your name and phone number on automated message systems because this information may be used without your consent to bill you later.

What to Watch For:

- Charges from companies unfamiliar to you.
- Monthly access or network charges from companies other than your long distance carrier.
- Charges on a separate page of the bill that appear to be state or federal fees. Legitimate state and federal fees charged by your local or long distance company generally appear on the same page as their other charges or should be clearly labeled as taxes.
- Services that you did not order, which may be labeled as "voice mail" or "debit cards".

What to Do:

- **DO NOT PAY** the unauthorized charges, but pay the rest of your phone bill on time. Your local service **CANNOT** be disconnected for non-payment of these disputed charges.
- Tell your local phone company that you are disputing the unauthorized charges.
- Advise the company that is charging you for unauthorized services that you did not order and will not pay for these services. Tell them to remove the charges from your bill and not to bill you in the future.
- Sometimes the charges will be listed under the name of a company acting as a billing agent. When you call to have charges removed, be sure to talk to the company making the charges and not just the billing agent. The billing agent may not be able to remove the charges.
- File a complaint with the Public Utility Commission (PUC). Be sure to include a copy of your bill.

Who can I talk to about this?

Call: 1-888-782-8477 toll-free or 936-7120 in Austin

Write: PUC - Customer Protection
P.O. Box 13326
Austin, TX 78711-3326

Fax: 512-936-7003

E-mail: customer@puc.state.tx.us

Public Utility Commission of Texas

PUCT - News Release

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POKA LAPIBRO

Public Utility Commission of Texas News Releases

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Office of Customer Protection, Information and Education, 1701 N. Congress Ave., Austin, TX 78701 Fax 512-936-7003

**Phone Disconnections Limited
New Rules Specify Prohibitions**

Contact:

Terry Hadley 512-936-7135

Pager: 512-322-1457

Austin, TX, December 2, 1999 - Texas residential local phone customers cannot be disconnected for nonpayment of long distance charges under rules adopted Wednesday by the Public Utility Commission (PUC).

Other benefits for Texas customers:

- Require that full or partial payment for residential service first be applied to basic local service.
- Require local phone service providers to offer toll blocking to limit long distance charges after long distance nonpayment.
- Cap rates that local providers can charge long distance providers for toll blocking.
- Require that residential deposits be based on local service only.

"Basic local telephone service is a life necessity and should be universally available," said Senator Royce West, who championed this legislation that is part of Senate bills 86 and 560 passed earlier this year by the Texas legislature. "It will undoubtedly improve the availability of local service, especially for elderly and low-income customers who have been most adversely affected by the practice of disconnecting local service for nonpayment of long distance service."

Any disconnection notice must state the exact amount owed for local telephone services. If phone services are bundled as one charge, the basic local service rate determines the amount that must be paid to avoid disconnection.

The rules also protect phone companies by allowing the disconnection of phone service if a customer attempts fraud, and by allowing toll blocking for failure to pay for long distance service. If toll blocking is done at the request of a long distance carrier for nonpayment, then the maximum customer charge is 10 dollars for installation and \$1.50 per month. Phone providers must comply with the rules no later than March 1, 2000.

In a separate action the Commission on Wednesday adopted rules continuing to allow phone customers to block calls to 1-900-xxxx or 1-976-xxxx numbers, also known as pay-per-call services, free of charge. Additional requests for call blocking may include a one-time charge.

All PUC News Releases are available at www.puc.state.tx.us

PJKAALA a/BAC

(a) A local exchange company shall print on the first page of each bill sent to a customer of the local exchange company the name of the customer's primary interexchange carrier if the company provides billing services for that carrier.

(b) The bill must contain instructions on how the customer can contact the commission if the customer believes that the named carrier is not the customer's primary interexchange carrier.

(c) The commission may, for good cause, waive the billing requirement prescribed by this section in exchanges served by local exchange companies serving not more than 31,000 access lines.

Sec. 55.012. TELECOMMUNICATIONS BILLING.

(a) The proliferation of charges for separate services, products, surcharges, fees, and taxes on a bill for telecommunications products or services has increased the complexity of those bills to such an extent that in some cases the bills have become difficult for customers to understand.

(b) A bill from a local exchange company for telecommunications products or services should be simplified into general categories to the extent that simplification is consistent with providing customers sufficient information about the charges included in the bill to understand the basis and source of the charges.

(c) To the extent permitted by law, a monthly bill from a local exchange company for local exchange telephone service shall include an aggregate charge for each of the following categories:

(1) basic local service charges and fees, which includes carrier's charges for basic local telecommunications service and related fees, assessments, and surcharges;

(2) optional services; and

(3) taxes, which includes any taxes applicable to the charges described by Subdivisions (1) and (2).

Sec. 55.013. LIMITATIONS ON DISCONTINUANCE OF BASIC LOCAL TELECOMMUNICATIONS SERVICE.

(a) A provider of basic local telecommunications service may not discontinue that service because of nonpayment by a residential customer of charges for long distance service. Payment shall first be allocated to basic local telecommunications service.

(b) For purposes of allocating payment in this section, if the provider of basic local telecommunications service bundles its basic local telecommunications service with long distance service or any other service and provides a discount for the basic local telecommunications service because of that bundling, the rate of basic local telecommunications service shall be the rate the provider charges for stand-alone basic local telecommunications service.

PDKA LAMBRO

(c) Notwithstanding Subsection (a), the commission shall adopt and implement rules, not later than January 1, 2000, to prevent customer abuse of the protections afforded by this section. The rules must include:

(1) provisions requiring a provider of basic local telecommunications service to offer and implement [at the request and expense of a long distance provider] toll blocking capability to limit a customer's ability to incur additional charges for long distance services after nonpayment for long distance services; and

(2) provisions regarding fraudulent activity in response to which a provider may discontinue a residential customer's basic local telecommunications service.

(d) Notwithstanding any other provision of this title, the commission has all jurisdiction necessary to establish a maximum price that an incumbent local exchange company may charge a long distance service provider to initiate the toll blocking capability required to be offered under the rules adopted under Subsection (c). The maximum price established under this subsection shall be observed by all providers of basic local telecommunications service in the incumbent local exchange company's certificated service area. Notwithstanding Sections 52.102 and 52.152, the commission has all jurisdiction necessary to enforce this section.

(e) A provider of basic local exchange telecommunications service shall comply with the requirements of this section not later than March 1, 2000.

Sec. 55.014. PROVISION OF ADVANCED TELECOMMUNICATIONS SERVICES.

(a) In this section, "advanced service" means any telecommunications service other than residential or business basic local exchange telephone service, caller identification service, and customer calling features.

(b) This section applies to a company electing under Chapter 58 or a company that holds a certificate of operating authority or service provider certificate of operating authority.

(c) Notwithstanding any other provision of this title, beginning September 1, 2001, a company to which this section applies that provides advanced telecommunications services within the company's urban service areas, shall, on a bona fide retail request for those services, provide in rural areas of this state served by the company advanced telecommunications services that are reasonably comparable to the advanced services provided in urban areas. The company shall offer the advanced telecommunications services:

(1) at prices, terms, and conditions that are reasonably comparable to the prices, terms, and conditions for similar advanced services provided by the company in urban areas; and

(2) within 15 months after the bona fide request for those advanced services.

FACSIMILE TRANSMITTAL

CONFIDENTIALITY NOTICE: The documents accompanying this telecopy transmission contain Confidential information which is legally privileged. The information is intended only for the use Of the recipient named below. If you have received this telecopy in error, please notify us Immediately by telephone at 1-800-422-2387 to arrange for return of the original documents to us, And you are hereby notified that any disclosure, copying, distribution or the taking of any action In reliance on the contents of this telecopied information is strictly prohibited.

DATE: 01-19-2000

ATTENTION: Dave

COMPANY: APTIS Application Support

TELECOPIER #: 1-518-431-7540

FROM: Sandra Teaff Poka Lambro

TOTAL # OF PAGES INCLUDING THIS COVER LETTER: 4

Please verify pages received and if any difficulties

Please contact us at 1-800-422-2387.

MESSAGE:

Please attach the Client alert to team track issue 22162.
Any questions contact me at 1800 422-2387 or direct line 806 924-5616



CSA
- Sandra
- Jan

6315 Seabrook Road, Seabrook, Maryland 20706
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsi.net, e-mail: jsi@jsi.net

JSI CLIENT ALERT

FCC ISSUES LIMITED WAIVER FOR TIB COMPLIANCE; COMPLIANCE DATES CREATE URGENT NEED FOR LECS TO ASSESS ABILITY TO COMPLY WITH TIB RULES BY APRIL 1

On Dec. 27, 1999, the Federal Communications Commission (FCC) released an order granting a temporary, limited waiver until April 1, 2000 from compliance with the Truth-in-Billing (TIB) service-provider identification, separation by provider, and billing inquiry contact requirements that otherwise went into effect on Nov. 12, 1999 (DA 99-3010, Order). The limited waiver applies to all companies meeting the conditions specified in the Order.

Previously, the FCC had waived until April 1, 2000 the effective date for other significant TIB rules with respect to notification of billing for new service providers and disclosure of whether charges are "deniable" or "nondeniable." The only TIB rule not waived until April 1, is the requirement for bills to include clear descriptions of billed charges. JSI has attached a table of the FCC's TIB rules, including a brief summary. Because the Order appears to afford the industry more certainty about the TIB effective dates, we believe it should serve as a catalyst for further comprehensive review by your company of your ability to comply with all applicable TIB rules by April 1, 2000.

Limited Nature of Waiver and Requirement for Bill Inserts

Carriers need to be aware of the "limited" nature of the waiver. First, the waiver applies only when compliance with the rules requires software and computer programming changes. Thus, if your company's software, or that of your company's billing vendor, already accommodates any of the three requirements addressed by the Order, you must comply immediately. Second, reliance on the waiver requires carriers to use bill inserts to inform customers of any delay in compliance. The bill inserts must include information describing the FCC rules that have been waived, how the bills depart from the rules, and what actions your company is taking to achieve compliance. JSI believes that bill inserts need to be customized to reflect individual company circumstances. JSI is prepared to assist clients with drafting bill inserts.

Urgent Need for Further Review of TIB Compliance Capability

For companies that have not already done so, JSI recommends that you undertake an assessment of your ability to comply with TIB requirements by April 1, 2000. If your company relies on a service bureau for billing, you should request an outline of the steps

the service bureau has taken or is taking to comply with the TIB rules. As an alternative, you can authorize JSI to contact your service bureau to conduct a compliance survey on your behalf.

As part of your TIB compliance assessment, consideration should be given to whether individual TIB requirements apply to the types of services billed by your company. For example, if a local exchange carrier (LEC) no longer bills for third parties, many of the TIB requirements related to separation of service providers may not apply. In the event a LEC's billing software, or that of its billing vendor, will not support compliance with all applicable TIB rules – despite good-faith efforts to complete necessary modifications – the company may need to file a company-specific waiver. JSI can also assist clients with evaluation of compliance and filing of any necessary waiver requests.

Third Party Billing Issues

Many of the challenges facing small companies for TIB compliance involve billing performed on behalf of third parties under billing and collection (B&C) agreements or, in some state jurisdictions, tariffs. Under such B&C arrangements, LECs are billing agents. It is important to remember that the duty for compliance with the new rules resides with the service provider, not the billing agent, although in some cases LECs may have assumed this duty as part of the contract terms. One type of third-party billing presenting challenges for TIB compliance is that associated with billing for aggregators (also called "clearinghouses"). Absent costly sub-CIC billing capability for third-party billing on behalf of aggregators, your billing system may be incapable of complying with TIB requirements to identify the different service providers, segregate the charges by actual service provider, or adequately describe the type of service related to the charges

If your company, or service bureau, has not already initiated modifications required as a result of third-party billing, you may not be able to provide B&C in a manner that complies with TIB by April 1, 2000. Because service providers, not billing agents, are ultimately responsible for TIB compliance, you may want to consider notifying B&C customers (i.e., third-party service providers or aggregators) of any inability to bill third-party charges in a manner compliant with TIB rules. In addition, you may want to explore B&C customer funding of TIB related modifications necessary only because of third-party billing.

Review of "Deniable" and "Non-Deniable" Charges

For the most part, state commission rules govern what charges are "deniable" or "non-deniable." The only types of charges "deniable" under FCC rules are those for information services; e.g., 900 calls. If you have not done so already, you should review your state rules applicable to the "deniable" or "non-deniable" status of charges on your bill. JSI is available to assist you in performing this review.

If you have questions regarding the FCC's TIB rules, or would like assistance in drafting bill inserts, assessing compliance, or filing waivers, please call Paul McMurray, Sue McCormack, or Scott Duncan at JSI's Seabrook, MD office, 301-459-7590.

<i>Summary of Truth-in-Billing Requirements</i>				
	<i>Rule Section</i>	<i>Requirement (Descriptions of requirement are paraphrased— actual rules provide elaboration)</i>	<i>Old Date</i>	<i>New Date</i>
1.	§64.2400	<i>Purpose and Scope.</i>	11/12/99	11/12/99
2.	§64.2401(a)(1)	<i>Bill Organization-Service Provider Name.</i> The name of the service provider associated with each charge must be clearly identified on the telephone bill.	11/12/99	4/1/00*
3.**	§64.2401(a)(2)	<i>Bill Organization-Multiple Carriers.</i> When charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider.	11/12/99	4/1/00*
4.**	§64.2401(a)(2)	<i>Bill Organization-New Service Providers.</i> Clear and conspicuous notification of new service providers.	4/1/00	4/1/00
5.	§64.2401(b)	<i>Descriptions of Billed Charges.</i> Charges contained on telephone bills must be accompanied by a brief, clear, non-misleading, plain-language description of the service or services rendered. (The full text of Section 64.2401(b) defines what the FCC means by "clear.")	11/12/99	11/12/99
6.	§64.2401(c)	<i>"Deniable" and "Non-Deniable" Charges.</i> When 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 ("Non-Deniable"), and charges for which non-payment will not result in such disconnection ("Deniable").	4/1/00	4/1/00
7.	§64.2401(d)	<i>Clear and conspicuous disclosure of inquiry contacts.</i> The billing agent's or aggregator's toll-free number is sufficient as long as they possess sufficient knowledge and authority to resolve customer inquiries and requests for adjustments.	11/12/99	4/1/00*

* For §64.2401(a)(1), the portion of §64.2401(a)(2) requiring separation of multiple carrier charges, and §64.2401(d), the extension until April 1, 2000, applies only when a company's billing software, or that of a company's service bureau, cannot accommodate the particular TIB requirement.

**There are two separate duties prescribed within §64.2401(a)(2).

Communications Software Consultants, Inc.

7 Southwoods Blvd. • Albany, NY 12211 • (518) 431-7500 • (518) 431-7540 fax

APTIS

commsoft fax...commsoft fax...commsoft fax...

To: Sandra Teaff **From:** Leighann Nastasia, Business Analyst

Fax: 806-924-5300 **Pages:** 3, including cover

Phone: 518-431-7524 **Date:** Feb. 7, 2000

Re: Time & Cost Estimate **CC:**

x Please Reply

• **Comments:** Dear Sandra: I have attached the T&C estimate for Change Disconnect/Warning Notice Processing. Let me know if you have any questions

Thank you, and have a nice day!

Sincerely,

Leighann Nastasia 518 431-7139
to new mailing people
518 431-7524
518 431-7524
518 431-7524
518 431-7524

Phone: 518-431-7524

E-mail: leighann.nastasia@aptissoftware.com

*Approved by
Boverel
2/10/00*

Customer: Poka-Lambro Telephone Co.
Contact: Sandra Teaff
Apris Tracking ID: 22162
Apris Responsible Dept.: Classic Telephony
Date: February 7, 2000

Description of Work to Be Performed:

CHANGE DISCONNECT/WARNING NOTICE PROCESSING.

Business Requirements

Poka-Lambro Telephone had requested changes to their existing system to allow for the following:

1. The ability to produce separate disconnect messages for business and residential customers.
2. The ability to maintain the text of the disconnect and reminder notices.
3. The ability to send these notices in both English and Spanish languages.

Implementation

In order to implement this new processing, Apris will need to use reserved message numbers in the billing messages file. Changes will need to be made to several RPG and CL programs in order to accommodate the maintainability of the text for the messages. Changes will need to be made to RPG programs to use the message file as the primary input for message text. The changes will also allow the messages to differ based on residential/nonresidential determination.

Cost

Analysis & Design			
Database Changes and Coding			
Testing/Debugging/Review - Development			
Quality Assurance Testing			
Documentation			
Total for Project			

Total estimated cost for this project is [REDACTED]. *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

Please Note: If your Account Manager does not receive any correspondence from you regarding this issue by 2/10/2000, Apris 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 "Disconnect Notice" process. If you have any questions regarding this document, please contact Leighann Nastasia at (518) 431-7505 or Leighann.Nastasia@Aprissoftware.com. This document may be marked up with changes and returned by FAX. Our FAX number is (518) 427-1642.

The implementation of the "Disconnect notice" 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 David McEndree

Date 2/10/00

Name David McEndree

Title CEO

*Sandy
Have copy!
Thanks
Huron*

From: LeighAnn Nastasia <leighann.nastasia@aptissoftware.com>
To:

Sandra Teaff

<teaffs@poka.com>

Date: Monday, February 07, 2000 12:23 PM
Subject: Truth in Billing requirements - deadlines!

February 7, 2000

To: All Classic Telephone customers
From: Leighann Nastasia, Business Analyst

Attention all Clients:

As you are aware, there is current legislation regarding Truth in Billing requirements with a deadline of April 1, 2000. We at Aptis will need information from each of you in terms of your intentions on this issue.

If you are relying on us to implement the modifications, please provide us with a detailed list of requirements. If necessary, we will schedule a conference call to clarify the issues once we receive them from you in writing.

There are two deadlines for Truth in Billing. Please break down your response into the following two phases (what has been done and what is still needed).

* Phase I - November 12, 1999

* Phase II - April 1, 2000

Feel free to contact me if you have any questions regarding Truth in Billing changes. Please respond in writing by Friday, February 11.

Sincerely,

Leighann J. Nastasia
Business Analyst
Aptis, A Subsidiary of Billing Concepts
Phone: 518-431-7524
Fax: 518-427-1642
<mailto:leighann.nastasia@aptissoftware.com>
<http://www.aptissoftware.com>

From: LeighAnn Nastasia <leighann.nastasia@aptissoftware.com>
To:

<teaffs@poka.com>

Sandra Teaff

Date: Tuesday, February 08, 2000 3:39 PM
Subject: Extensions

Update to Truth in Billing:

I have gotten a response from a few of you. (I apologize if you do not need this information, as some of you have stated that you are all set in this area). I do need to add the following regarding an extension to the April 1 deadline. We are asking all of our clients to file for an EXTENSION past the April 1 deadline for Phase II. Since we have recently become aware of the Phase II requirements, resources may limit our ability to complete all the changes, depending on how much our clients ask for. We are asking this to be on the safe side, although we plan to do all we can to complete the changes by the deadline.

I do have detailed information regarding the Phase I requirements, as follows:

- 1) List the "Name" of each service provider in conjunction with the charges they now provide.
- 2) List an 800# or other local number for inquiry purposes for each provider on the bill.
- 3) Present the billing statement with information regarding the type of service provided. (module 002b)
- 4) Separate all Toll records on the bill by designated Carrier ID or Identity. (module 002b)
- 5) Create and provide a new File to maintain and store information required for this purpose.
- 6) Provide an input screen to allow for maintenance and upkeep of related data.

Phase II requirements are not completely known to us, as they vary among states. Dave Johnson is working to gather further information; however, you need to be aware that it is ultimately up to you to get the details on Phase II. I will keep you posted on his findings. If you have any questions regarding the details of either Ph I or II, you may contact Dave directly.

Sincerely,

Leighann J. Nastasia
Business Analyst
Aptis, A Subsidiary of Billing Concepts
Phone: 518-431-7524
<mailto:leighann.nastasia@aptissoftware.com>
<http://www.aptissoftware.com>

From: LeighAnn Nastasia <leighann.nastasia@aptissoftware.com>
To:

Sandra Teaff <teaffs@poka.com>

Cc: Dave Johnson <david.johnson@aptissoftware.com>
Date: Monday, February 14, 2000 1:43 PM
Subject: Truth in Billing Update

Hello all: Here is the update to the Truth in Billing Requirements (deadline of April 1). Many of you have already responded with your requirements as you understand them, and many have responded that you do not believe you will need anything from Aptis for these requirements. Below is a summary of the requirements as mandated by the FCC. Please understand that you are ultimately responsible for alerting Aptis to the changes you require. It is important to note that although these requirements are national, each state may have special requirements - your PUC or PSC may add to or delete from this list, and we are not aware of the requirements for each state. Keep in mind that we still recommend filing for an extension for the April 1 deadline, as a precautionary measure.

*** If you have not already done so, or if you feel you have additional requirements than previously thought; please send us your Truth in Billing Requirements in writing as soon as possible (either e-mail or fax). Several of you have mentioned that you believed we were taking care of everything - we are not making any changes to your specific system unless asked to do so.

Here is a web address which outlines the FEDERAL Truth in Billing requirements. A summary is listed about 2/3 of the way into the document, as follows below. Please check with your PUC or PSC to determine whether your state has special requirements. Thank you.

http://www.fcc.gov/Bureaus/Common_Carrier/Orders/1999/fcc99072.txt

64.2401(a)(1) Billing Organization - Service Provider Name

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

64.2401(a)(2) Bill Organization - Multiple Carriers. When charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider.

64.2401(a)(2) Bill Organization - New Service Providers. Clear and conspicuous notification of new service providers.

64.2401(b) Descriptions of Billed Charges. Charges contained on the telephone bills must be accompanied by a brief, clear, non-

misleading, plain-language description of the service or services rendered. (The full text of Section 64.2401(b) defines what the FCC means by "clear".)

64.2401(c) "Deniable" and "Non-Deniable" Charges. When 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 ("Non-deniable"), and charges for which non-payment will not result in such disconnection ("Deniable").

64.2401(d) Clear and conspicuous disclosure of inquiry contacts. The billing agent's or aggregator's toll-free number is sufficient as long as they possess sufficient knowledge and authority to resolve customer inquiries and requests for adjustments. This includes SUB-CIC codes and 800's for casual calls.

Leighann J. Nastasia
Business Analyst
Aptis, A Subsidiary of Billing Concepts
Phone: 518-431-7524
<mailto:leighann.nastasia@aptissoftware.com>
<http://www.aptissoftware.com>

**Requirements Document
Poka-Lambro Telephone Cooperative**

Page 1 of 3

Aptis

FAXED
2/18/00

Requirements Document

**Truth in Billing
Payment Application Processing**

Prepared by:
Aptis
Classic Telephone
Leighann Nastasia, Dave Johnson and the
Telephony Team

February 18, 2000

Distribution:
 Sandra Teaff, Poka-Lambro Telephone Coop.

**Requirements Document
Poka-Lambro Telephone Cooperative**

Page 2 of 3

1. Subject

Truth in Billing Phase II for March 1, 2000 deadline - Payment Application Processing

2. Business Requirements

The client has requested modifications in accordance with FCC mandated Truth in Billing legislation, as described in the items below. These items are based on the client's understanding of the federally mandated guidelines.

1. *Bill Organization - Service Provider Name:* The name of the service provider associated with each charge must be clearly identified on the telephone bill.
2. *Bill Organization - Multiple Carriers:* When charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider.
3. *Bill Organization - New Service Providers:* Clear and conspicuous notification of new service providers.
4. *Descriptions of Billed Charges:* Charges contained on the telephone bills must be accompanied by a brief, clear, non-misleading, plain-language description of the service or services rendered. (The full text of this item defines what the FCC means by "clear.")
5. *"Deniable" and "Non-Deniable" Charges:* When 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 ("Non-deniable"), and charges for which non-payment will not result in such disconnection ("Deniable").
6. *Clear and conspicuous disclosure of inquiry contacts:* The billing agent's or aggregator's toll-free number is sufficient as long as they possess sufficient knowledge and authority to resolve customer inquiries and requests for adjustments.

The client has also requested specific modifications to apply payments against regulated charges followed by deregulated charges. A record of disputed charges and customer information must also be maintained.

7. *Table:* Maintainable payment applications table.
8. *Apply Payments:* Related processes to apply payments by payment table-defined hierarchy.
9. *Data Files:* Data files to hold disputed charges and related information.
10. *Disputed Files:* Process to load and maintain disputed files.

3. Design Description

Apitis will perform the following tasks in order to implement the above requirements:

- *Table:* Modification to the current payment application processing to allow payment by a table-defined hierarchy.
- *Apply Payments:* Creation of a payment hierarchy table which will be used in the above process to properly apply portions of payments such that underpayments will be applied against non-deniable charges before deniable charges.
- *Data Files:* Creation of maintenance processes to allow the end user to update and modify the payment hierarchy table.
- *Disputed Files:* Creation of a disputed file will be necessary in order to hold charges and information pertaining to disputed charges. This file will be time/date stamped for auditing purposes. Program changes will be necessary to populate a disputed charges file from the service order system (OCCs) and from the file maintenance menu Credit/Rebill Toll Functions.

**Requirements Document
Poka-Lambro Telephone Cooperative**

4. Costs

Please review the associated Cost table listed below.

Requirements, Design, & Analysis			
Development			
Unit Testing			
QA Testing			
User Documentation			
Total for Project			

Total estimated cost for this project is [REDACTED] *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 business 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.

5. Approval

5.1. Contacts

- Please review this Requirements Document outlining our proposal for your Truth In Billing process.
- If you have any questions regarding this document, please contact Leighann Nastasia at (518)-431-7505 or Leighann.Nastasia@Abussoftware.com.
- This document may be marked up with changes and returned by FAX; however, the cost estimate may need modification if changes are made to the original document. This information will be communicated to the client, and a new Requirements Document will be sent. Our FAX number is (518)-427-1642.

5.2. Deadlines

In order to comply with the release schedule of this request, as listed in the "Release" section of this document, we must have your approval by the following February 23, 2000. Please note that if the document is not received by 2/23/00, we cannot guarantee that it will be included in the intended release.

The implementation of the Truth in Billing 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.

***If Aptis does not receive any correspondence from you regarding this issue by 2/23/00, we will consider that as an indication that this requirement has been withdrawn by your company.

Wendell B. Morrow 2/23/00
 Signature Date

Wendell B. Morrow
 Name

Poka Lambro Telephone Cooperative, Inc. President
 Company Title

From: LeighAnn Nastasia <leighann.nastasia@aptissoftware.com>
To: Sandra Teaff <teaffs@poka.com>
Date: Friday, February 18, 2000 2:31 PM
Subject: Requirements Document

Hi Sandra: I just sent a fax to you regarding the Truth in Billing requirements - Apply Payments. Please review and let me know if you have any questions. Have a nice weekend.

Sincerely,

Leighann J. Nastasia
Business Analyst
Aptis, A Subsidiary of Billing Concepts
Phone: 518-431-7524
<mailto:leighann.nastasia@aptissoftware.com>
<http://www.aptissoftware.com>



POKA LAMBRO

P O Box 1340
11.5 Miles N of Tahoka, TX-HWY 87
Tahoka, TX 79373-1340
Phone: (806) 924-7234
FAX: (806) 924-5404-5001

FACSIMILE TRANSMITTAL

CONFIDENTIALITY NOTICE: The documents accompanying this telecopy transmission contain confidential information which is legally privileged. The information is intended only for the use of the recipient named below. If you have received this telecopy in error, please immediately notify us by telephone to arrange for the return of the original documents. You are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited.

DATE: 2-23-2000	TO: Tammy Ferranova
COMPANY: aptis	FROM: Sandra Hoff - Poka Lambro
TELECOPIER NO: 518 427-1642	TOTAL # OF PAGES: 9

MESSAGE:

*Tammy,
Copies of info sent with original request.*

*refused.
everything
from 1/14/00*

PLEASE VERIFY PAGES RECEIVED AND IF ANY
DIFFICULTIES, PLEASE CONTACT US AT
1-800-422-2387

APTIS PROGRAM REQUEST FORM

Directions: This form can be used to request programs or program changes. Please complete the form and return it to Aptis Applications Support Department at 7 Southwoods Blvd, Albany, NY 12211-2352. (Fax 518 431-7540)

Part A: Requester Information

Company Name: Poka Lambro Telephone
Date of Request: 01-14-2000
Requested by: Sandra Teaff Department: DP

Customer Tracking Number: POK20000114

Part B: Request Information

Type of Request (please check one of the following):

- Explanation of error message (and adjustment as necessary)*
- Correction of an error in an existing program
- Change an existing program
- Create a program
- Other (please describe) _____

FAX
518 431-1193

* Please submit screen prints. To complete the prints, position the cursor at the error message, and press the **HELP** key (or right-click mouse button). A screen that explains the message is displayed. Print this screen.

In the spaces provided below, please describe additional information on the problem (such as details on when it occurs) or the request. Please attach additional pages as necessary.

Due to changes by the Texas PUC we have need of a T&C for the TRUTH IN BILLING changes and also need changes made to our late notice process. The late notice requirement is effective March 1, 2000. I will attach what information I have available to help you make your assessment. We would appreciate some contact on this as soon as possible since we have a short time frame for implementation. I would appreciate knowing if you have any of the TRUTH in BILLING changes in place for any of your other companies.

Part C: Customer Consent

This form must be signed by a representative of the company requesting program changes or new programs. Work cannot begin on a request for a program change or new program until Aptis has the written consent of such a representative.

Authorized by: Sandra Teaff
Title: DP Manager
Date: 01-14-2000
Sandra Teaff 2/3/00

Part D: For Aptis Use Only

Date received:	_____	Assigned to/date assigned:	_____ / _____
Trouble Ticket #:	_____	Called in by/date:	_____ / _____



POKA LAMBRO

P O Box 1340
11.5 Miles N of Tahoka, TX-HWY 87
Tahoka, TX 79373-1340
Phone: (806) 924-7234
FAX: (806) 924-5001

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CONFIDENTIALITY NOTICE: The documents accompanying this telecopy transmission contain confidential information which is legally privileged. The information is intended only for the use of the recipient named below. If you have received this telecopy in error, please immediately notify us by telephone to arrange for the return of the original documents. You are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited.

DATE: 3-7-2000	TO: Jimmy Ferrarone
COMPANY: <i>aptis</i>	FROM: <i>Sandra Jeff</i>
TELECOPIER NO: 1518 427-1642	TOTAL # OF PAGES: 5

MESSAGE:

*Copies of info from INs and illumination on TIB
Team Track Issue 22162*

*Fin Code 12 Fin Code 22 + applicable taxes
Fin Code 14 Fin Code 24*

52 Cover page Bill message page

*55 English Inq above title line disconnect notice
54 English Do not edit*

Disconnect notice: Phone# (check on this)

PLEASE VERIFY PAGES RECEIVED AND IF ANY
DIFFICULTIES, PLEASE CONTACT US AT
1-800-422-2387

02/15/00 11:05:26

1->

0069245001 Sandra Teaff

Page 001

**INDEPENDENT
NECA
SERVICES, INC.**

80 South Jefferson Road
Whippany, NJ 07981

RAYMOND L. WOLITZ

Executive Director

Voice: 973-884-8130

Fax: 973-884-8151

E-mail: rwolitz@neca.org**Date: February 15, 2000****To: Exchange Carrier Participants in the INS Billing and Collection Program****Re: Implementation of Truth in Billing Requirements**

As previously described in my correspondence of January 3, 2000, the FCC has granted a limited waiver until April 1, 2000 to implement the requirements of the Truth in Billing Order. By that date, all customer bills must contain the following information:

1. Clear identification of the name of the Service Provider associated with each charge on the customer's bill.
2. A brief, clear, plain language description of the services included on the customer's bill.
3. Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
4. Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement including, where appropriate, any new presubscribed or continuing relationship with the customer.
5. A differentiation between deniable and non-deniable charges

Relative to Item 1, in cases where charges from Service Providers are sent by a clearinghouse or other "aggregator", each individual Service Provider must be identified. In such cases, individual Service Providers are identified by their Sub-CIC code.

The Ordering & Billing Forum (OBF) has recommended the use of a 002-B module as the industry standard for sending Sub-CIC codes. This recommendation was based on the limited space available on a standard 175 fixed character EMI record.

Consequently, in a letter sent to all Service Providers who participate in INS billing and collection programs, INS has recommended that beginning March 15, 2000, Service Providers send all required Sub-CIC information in 002-B modules.

Relative to Item 4, on February 7th OBF adopted the 020-A module as the industry standard for the identification of new Service Providers. As with the 002-B module, INS has advised Service Providers to also start utilizing this module beginning March 15th.

In addition, where in the past INS has had its Service Bureau, UDP, truncate EMI records containing modules for certain Exchange Carriers who were not able to process such modules,

INS has now advised UDP that, beginning March 15th, UDP send the entire EMI record, including any modules, to the Exchange Carrier.

For Exchange Carriers who do billing for third parties, this means that by March 15, 2000 their billing systems should have the capability to accept and process 002-B modules and 020-A modules.

You will also recall that in October, 1999, INS requested that you provide Time and Cost (T&C) estimates for changes to your billing system, or your Service Bureau's system if appropriate, to comply with Truth in Billing requirements. We have analyzed the results of that survey and are planning to begin discussions with Service Providers on reimbursements to cover these costs. If you have not completed a Time and Cost estimate you can do so on the INS website at www.ins.org.

In summary, INS has recommended that, beginning March 15, 2000 all Service Providers begin sending 002-B modules and 020-A modules and that UDP cease to truncate modules sent with EMI records. If you feel that your company will not have the capability to accept and process these modules by March 15, please contact either Kathy Roman at 1-800-524-1020, extension 8474 (kroman@neca.org) or Jean Snopkowski at 1-800- 524-1020, extension 8146 (jsnopko@neca.org).

Should you have any questions concerning this correspondence, or any other issues concerning Truth in Billing, please contact Tom Carroll, Director - Operations Management, on 1-800-524-1020, extension 8558, or by E-mail at tcarrol@neca.org.

Sincerely,


FOR R. WOLITZ

cc: T. Carroll
K. Roman
J. Snopkowski



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 at (360) 493-6000.

PORK LAMB

- If your company is certain of the rate that the customer should be receiving, your company may re-rate the toll charge and report this adjustment on your LEC invoice. Again, please ensure to include call detail (bill number, dollar amount credited, CIC, and adjustment reason 411 - re-rate).

Just a reminder, MCI has available a CARE Hot Line number, (877) 698-4771 to assist in working through CARE related issues that may be affecting MCI charges to your customer.

As always, if you have questions or concerns, don't hesitate to call ILLUMINET. Your Customer Service Specialist is here to assist you.

Truth-in-Billing Update

The FCC has granted temporary waivers for Truth-in-Billing requirements. ILLUMINET advises readers to refer to FCC Docket No. 98-170 for compliance. The FCC has issued the statement below.

FCC and "Truth in Billing" Deadline Waivers

The FCC has granted temporary waivers of the deadline for compliance with rules adopted in its Truth in Billing and Billing Format proceeding. Small and rural carriers in telecom industry associations had said they needed more time to comply with the new billing requirements.

Eligible carriers now have until April 1, 2000, to include information on their bills regarding how to contact third party service providers such as interexchange carriers, "dial around" (10-10-XXX) long distance carriers, and alternative operator service providers.

The FCC said the waivers applied to all carriers facing difficulties including this contact information on consumer bills, "regardless of whether those carriers have already filed waiver requests or are members of the trade associations that filed the joint petition."

Specifically the FCC granted temporary, limited waivers until April 1, 2000 for compliance with:

- 64.2401 (a)(1) provider identification: 64.2401 (a)(2) separation by provider and 64.2401 (d) billing inquiry contact to the extent that compliance will necessitate software and programming changes.
- 64.2401 (b) description of billed charges to the extent that compliance is affected by Y2K and related computer programming concerns.

The waivers were granted conditioned upon the requirement to provide, until April 1, 2000, billing inserts that describe:

- The FCC's rules that have been waived.
- How a bill departs from the FCC's requirements.
- The actions being taken to accomplish compliance with the FCC's Truth-in-Billing requirements.

Received
3/27/00

our
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lude



Please complete the information below and fax this form back to ILLUMINET, Attn: Sarah Gammon at (360) 823-3477.

_____ 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: _____



March 9, 2000

7411 John Smith Drive
Suite 200
San Antonio, TX 78229
P 210.949.4700
F 210.949.7100

8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

110 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411

Poka Lambro Communications
Sandra Teaffs,
I/S Manager
PO Box 1340
Route 87 No. Tahoka
Tahoka, TX 79373

To all Aptis Clients

Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7135.

Sincerely,

Cathie Srodoski
Business Unit Director

From: Cathie Srodoski <Cathie.Srodoski@aptissoftware.com>
To: 'teaffs@poka.com' <teaffs@poka.com>
Date: Monday, March 13, 2000 5:03 PM
Subject: Conference Call

Sandra -

Sometime this week, I'd like to set up a conference call with you (and whomever else you feel should be involved) to discuss the Business Unit re-organization and change in processes that I outlined in my memorandum.

Please let me know when works best for you. I am available on Tuesday, Wednesday or Thursday.

Thanks -
 Cathie Srodoski
 BUSINESS UNIT DIRECTOR
 Aptis, A Subsidiary of Billing Concepts
 Phone: 518-431-7135
 Fax: 518-427-1642
 E-mail: cathie.srodoski@aptissoftware.com

*5:03 p.m.
 3-13-2000
 teaffs@poka.com*

Sandra - [unclear] - [unclear]

[unclear]

[unclear]

From: Cathie Srodoski <Cathie.Srodoski@aptissoftware.com>
To: 'teaffs@poka.com' <teaffs@poka.com>; John Barnard <John.Barnard@aptissoftware.com>
Cc: Barbara Cardone <Barbara.Cardone@aptissoftware.com>; Mary Marcolin <Mary.Marcolin@aptissoftware.com>; Paul LaBarge <Paul.LaBarge@aptissoftware.com>
Date: Tuesday, March 14, 2000 7:10 PM
Subject: Conference Call with Aptis

When: Wednesday, March 15, 2000 3:00 PM-4:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: Cathie Srodoski's Office

~~*~*~*~*~*~*~*~*

This conference call is scheduled for 2:00p (cst), 3:00p (est).

Sandra - Please call my office at 518.431.7135.

We'd like to discuss the new Business Unit structure and changes in processes. In addition, we'd like to discuss the Truth in Billing Issue.

Thanks and talk to you soon!

*Sandy
 Leah
 Jan
 Cathie Srodoski
 John Barnard
 & two others*

*discussed sub-cic & deniable/non-deniable
 changes were discussed - these are 2 key issues
 not working - Requested 6 months - gave
 them 90 days to resolve.*



March 15, 2000

San Antonio Office:
7411 John Smith Drive
Suite 300
San Antonio, TX 78229
P 210.949.7000
F 210.949.7100

Sandra Teaffs
Paka Lambro Communications
PO Box 1340
Route 87 No. Tahoka
Tahoka, TX 79373

Albany Office:
8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

Re: Truth in Billing FCC Requirement

Dear Sandra:

Per our conversation today, please file for a 90 day extension, effective March 15, 2000, on the FCC Requirement for Truth in Billing.

Austin Office:
2150 Woodward
Building F, Suite 200
Austin, TX 78744
P 512.732.4700
F 512.732.4100

In approximately a week you will be receiving detailed requirements documents, which outline the necessary changes to the Classic Product Line to comply with this FCC Requirement. We will be contacting you to discuss the requirements documents to ensure that we are performing the development necessary for you to comply.

Please feel free to contact me with any questions or concerns.

Sincerely yours,

Cathie Srodoski
Business Unit Director

Glendale Office:
116 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411

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 "Supplement to March 21, 2000 Petition for Temporary, Limited Waiver" was served on this 29th day of March, 2000, by hand delivery to the following parties:


Shelley Davis

Lawrence Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C450
Washington, DC 20554

Deena Shetler, Legal Counsel
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C410
Washington, DC 20554

Carol Matthey, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5B125
Washington, DC 20554

International Transcription Services
1231 20th Street, NW
Washington, DC 20554

Glenn T. Reynolds, Division Chief
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-A847
Washington, DC 20554

Katherine Schroder, Deputy Chief
Accounting Policy Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C453
Washington, DC 20554

K. Michele Walters
Associate Division Chief
Accounting Policy Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C453
Washington, DC 20554