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KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

NEW YORK, NY
TYSONS CORNER, VA
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TOKYO, JAPAN

FACSIMILE
(202) 955-9792
www.kelleydrye.com

DIRECT LINE (202) 887-1257
E-MAIL: AKlein@KelleyDrye.com

August 13, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room CY-B402
Washington, D.C. 20554

Re: Application of Verizon for InterLATA Authority in Pennsylvania
Notice of *Ex Parte* Presentation; CC Docket 01-138

Dear Secretary Salas:

Pursuant to Section 1.1206(b)(1) of the Commission's Rules, the Competitive Telecommunications Association ("CompTel"), by its attorney, submits this notice of an *ex parte* presentation made in the above-captioned proceeding on August 10, 2001. Filed herewith is the *ex parte* presentation that was made to Robert Tanner and Trey Hanbury of the Common Carrier Bureau, in response to a request from Commission staff. As indicated on the *ex parte*, CompTel discussed its concerns regarding Verizon Pennsylvania's inability to render wholesale bills in compliance with the competitive checklist contained in section 271 of the Communications Act of 1934, as amended.

CompTel is filing both confidential and public versions of the *ex parte*, as it contains commercially sensitive information. In accordance with the Commission's Public Notice and Rules, an original and two copies of the redacted *ex parte* presentation is provided for inclusion in the public record of this proceeding, while one copy of the confidential version is being filed separately.

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Should you have any questions with regard to the foregoing, please do not hesitate to contact me at your convenience.

Respectfully submitted,

Andrew M. Klein
Counsel to the Competitive
Telecommunications Association

Enclosures

cc: Robert Tanner
Trey Hanbury
Susan Pie
International Transcription Service
Kelly Trainor, U.S. D.O.J.
Frances Marshall, U.S. D.O.J.
Ann Berkowitz, Verizon

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Klein, Andrew M.

From: Klein, Andrew M.
Sent: Friday, August 10, 2001 1:10 PM
To: Rob Tanner (E-mail); Trey Hanbury (E-mail)
Cc: Kashatus, Jennifer M.
Subject: Pa 271 Information

Importance: High

Robert Tanner
Trey Hanbury
Federal Communications Commission

Messrs. Tanner and Hanbury:

In accordance with my voice mail, we have been able to obtain some information from MetTel regarding the percentage of the Verizon-PA bills under dispute.

The numbers we obtained from MetTel indicate that it has disputed over 92% of the amounts billed by Verizon-PA through June 16, 2001. MetTel detailed the actual dispute and listed the amounts being paid in an e-mail from F. Lazzara, MetTel CFO, to Leonard Canalini and other Verizon personnel on August 2, 2001.

To date, MetTel is still unable to read the vast majority of the invoices submitted by Verizon, and has discovered errors in the portions it is able to decipher.

Most significantly, however, is the fact that MetTel has now received from Verizon a billing tape containing another CLEC's customer information. In connection with the July 16, 2001, invoice, MetTel received a tape labeled "MetTel" that contained customer billing information for FairPoint Communications. MetTel did not receive any of its own customer billing data, and has opened a trouble ticket with Verizon (#******). The trouble ticket was acknowledged by Joan Bradley of Verizon, at (617) 743-3879. Verizon has provided no status reports, and has, to date, failed to provide the MetTel billing tape. MetTel's surmises that its highly proprietary customer billing information was erroneously sent to another CLEC.

Please let me know if you have any questions regarding the foregoing, or if any additional information is needed.

Regards,
Andy

Andrew M. Klein
Kelley Drye & Warren LLP
1200 19th Street, N.W.
Washington, DC 20036
Office: (202) 887-1257
Mobile: (202) 997-0273
Fax: (202) 955-9792
AKlein@KelleyDrye.com

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Kate Economou

From: F. Lazzara
Sent: Thursday, August 02, 2001 7:15 PM
To: leonard.g.canalini@verizon.com; joe.a.corticada@verizon.com; billing.tisoc@verizon.com; tisoc.billing.south@verizon.com
Cc: Andoni Economou; Kate Economou; Richard Aguinaldo
Subject: Pennsylvania Claims and Payment Notice

Attached please find Claim [redacted] through [redacted][1] for each of MetTel's Pennsylvania BANs. You will recall that MetTel has repeatedly contacted Verizon, both verbally and through various correspondences over the past ten months, to address and resolve the outstanding billing and consequent provisioning issues resulting from the erroneous invoices Verizon has continuously generated. Because MetTel did not receive any BOS/BDTs for invoice periods through March, and because any received thereafter -we believe there were only two - have not conformed to industry (OBF/Telcordia) standards, MetTel has been unable to parse and reconcile any data. Verizon's inability to produce an accurate and commercially viable and reconcilable bill in a timely fashion has led, in turn, to MetTel's inability to review any past invoices and to submit claims for invalid charges and rates.[2] A cursory review of a sampling (through the bill period ending [redacted],2001) of the individual paper bills for end user accounts evidences that these inaccuracies persist and, thus, MetTel has every reason to believe that they are mirrored on the electronic invoice. For that reason, MetTel challenges the full amounts of all previous invoices through [redacted], 2001.

Attached you will also find Claims [redacted] through [redacted], [redacted] through [redacted][3], and [redacted] through [redacted][4] for Invoice Date [redacted], 2001 for each BAN for the following:

a. late payment fees incurred due to the issues stated above ([redacted])
b. application of incorrect rates ([redacted])
c. charges for resale usage on UNE accounts ([redacted])
d. and finally, OCC in its entirety ([redacted]); Because the BOS/BDT received for the June invoice still does not conform to industry standards, MetTel cannot successfully parse all of the sections of the bill in order to validate the charges therein. MetTel is therefore left with no recourse other than to challenge the entire amount.

Verizon will receive, under separate cover, a payment for each BAN for the amount remaining, as follows:

[redacted]	[redacted]	[redacted]
Amount Due [redacted]	Amount Due [redacted]	Amount Due [redacted]
Claims Submitted [redacted]	Claims Submitted [redacted]	Claims Submitted [redacted]
Payment [redacted]	Payment [redacted]	Payment [redacted]

Frank Lazzara
Chief Financial Officer
MetTel
44 Wall Street, 14th Floor
New York, NY 10005
T. 212-607-2017
F. 212-635-3451
e. flazzara@mettel.net
url. http://www.mettel.net

[redacted]

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[1]Claim [redacted] in the amount of $[redacted] BAN [redacted]
Claim [redacted] in the amount of $[redacted] BAN [redacted]
Claim [redacted] in the amount of $[redacted], BAN [redacted]

BAN [redacted]
[2]Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]

BAN [redacted]
[3]Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]

BAN [redacted]
[4]Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]
Claim [redacted] in the amount of $[redacted]

[redacted].xls [redacted].xls [redacted].xls [redacted].xls

[redacted]

[redacted]