

SUPPLEMENTAL REPLY DECLARATION OF
KATHLEEN McLEAN, RAYMOND WIERZBICKI, AND
CATHERINE T. WEBSTER

ATTACHMENT 5

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

SUPPLEMENTAL REPLY DECLARATION OF
KATHLEEN McLEAN, RAYMOND WIERZBICKI, AND
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ATTACHMENT 6

REDACTED – FOR PUBLIC INSPECTION

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SUPPLEMENTAL REPLY DECLARATION OF
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ATTACHMENT 7

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SUPPLEMENTAL REPLY DECLARATION OF
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ATTACHMENT 8

**COMPARISON OF NEW JERSEY AND
NEW YORK BILLING DISPUTES**

New Jersey Billing Disputes			
Month	Amount of Claims For Bill Month	Total Billed (Current Charges)	% Amount Claimed of Total Billed
Nov-01	\$ 157,108.54	\$ 7,351,980.14	2.1%
Dec-01	\$ 317,092.33	\$ 7,614,371.61	4.2%
Jan-02	\$ 344,689.74	\$ 4,572,916.46	7.5%
Feb-02	\$ 120,161.51	\$ 5,953,210.24	2.0%
Total	\$ 939,052.12	\$ 25,492,478.45	3.7%

New York Billing Disputes			
Month	Amount of Claims For Bill Month	Total Billed (Current Charges)	% Amount Claimed of Total Billed
Nov-01	\$ 3,295,420.58	\$ 55,251,979.10	6.0%
Dec-01	\$ 6,277,412.85	\$ 56,057,698.12	11.2%
Jan-02	\$ 1,573,652.69	\$ 52,401,148.03	3.0%
Feb-02	\$ 2,776,596.78	\$ 49,334,454.01	5.6%
Total	\$ 13,923,082.90	\$ 213,045,279.26	6.5%

As shown above, the amount of current charges that have been disputed by CLECs in New Jersey is comparable to the experience in New York where CLECs have agreed that the quality of Verizon's billing is good. The claims amounts shown above are billing disputes submitted by CLECs whether or not Verizon agrees with them. Disputes are included in the month to which the CLEC attributed them. For example, if a CLEC submitted a \$2,500 dispute in February and said it was for the November and December bills without specifying the amount attributable to each month, it was counted as a dispute for \$1,250 in November and a dispute for \$1,250 in December. If the CLEC specified the particular amount in dispute for each month, that amount was attributed to the month specified by the CLEC. Of course, the fact that a charge is disputed does not mean that the bill is not accurate. Nonetheless, the Commission previously has looked to actual commercial practice by CLECs in submitting disputes as one indicator of the parties' actual commercial experience in working with the bills. The above numbers show that the experience in New York and New Jersey is comparable. As explained below, these numbers were calculated to provide a direct apples-to-apples comparison.

In order to provide a direct comparison of the amount of current charges that are disputed in each state, the amount of claims shown above for both New Jersey and New York excludes claims for Late Payment Charges. By way of background, Verizon applies late payment charges to CLECs' bills if payment is more than 30 days overdue. If a CLEC submits a dispute with respect to a charge on its bill, it is not required to pay the disputed amount until the dispute is resolved in Verizon's favor. While the claim is

pending, late payment charges will continue to accrue on the CLEC's bill. If the dispute is resolved in the CLEC's favor, the amount charged will be adjusted and a credit will appear on the CLEC's bill. In addition, the associated late payment charges that have accrued will be credited to the CLEC. As a result, disputes concerning late payment charges are not "billing" disputes, and they have been excluded from both the New Jersey and the New York results.

The amount of claims shown above for New Jersey excludes certain claims from a small number of resellers relating to blocking issues for pre-paid customers. These claims are both unique to these New Jersey resellers, and are not claims that relate to the accuracy of Verizon's bills. As a result, they should be excluded to provide a meaningful comparison. By way of background, blocking disputes typically involve claims, *e.g.*, that a CLEC ordered blocking on a line which Verizon failed to provision. The CLEC disputes charges on its bill for calls made that it claims should have been blocked if the blocking had been provisioned as ordered. Verizon treats such claims as billing disputes, and has included amounts for such claims in the analyses above, whether or not Verizon agrees with a particular claim.

In New Jersey, however, a few CLECs have chosen to serve the residential market as "pre-paid". (These CLECs typically market their service to end users who have been denied service by other carriers. The end user pre-pays for its local service and the CLEC usually limits the toll calls the end user can make.) Here, these resellers chose to serve this market without ordering blocking on the lines; instead they submitted the order with "PIC NONE" and "LPIC NONE." Verizon correctly provisioned the orders. As the Commission is aware, "PIC NONE" and "LPIC NONE" on a line prevent 1+ intraLATA or interLATA calls from being made on the line, but it do not prevent "dial around" calls. Here, the pre-paid reseller's end users made dial around calls, which were billed to the resold lines on behalf of the IXC that carried the call. The resellers have submitted "disputes" with respect to these charges from other carriers, apparently on the theory that Verizon should pay the charges the resellers' end users incurred from other carriers as a result of the resellers' own choice not to order blocking on the line. These "disputes" represent approximately 75 percent of the blocking disputes submitted in New Jersey. These "disputes" do not reflect errors (whether ordering, provisioning, or billing) on Verizon's part – the orders were correctly provisioned and the services are performing as they should. Instead, these claims result from CLECs attempting to use a service to do something it was never intended to do. As a result, these claims are wholly unrelated to the accuracy of Verizon's bills and have been excluded from the New Jersey numbers shown above.

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ATTACHMENT 9

2002 BDT Information New Jersey

	Jan-02	Feb-02	Mar-02
New Jersey			
BDT Trouble Tickets	6	7	6
BDT Tickets requesting Resends	4	3	5

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ATTACHMENT 10

SECTION 5: CABS BILLING DATA TAPE DIFFERENCES LIST**PURPOSE AND SCOPE**

- 5.01 Due to tariff requirements, FCC/State mandates, customer requests and other business needs, Exchange Companies have been, and will continue, providing information not consistent with these Specifications.
- 5.02 In support of OBF Issue 504, Exchange Companies have agreed to use a standard form to communicate Billing Data Tape differences to their customers. This section has been created to document the standard form and its contents. Attachment 1-5-1 is provided as an illustration.

GENERAL INFORMATION

- 5.03 ECs will prepare their BDT differences list employing a four part form. Part 1 of the form will address record space only. Part 2 will be used to document any redefinition, additional values and code sets associated with existing data elements. Part 3 of the form will be employed to communicate new and local use phrase codes. The last part of the form will describe all the local calling plan types associated with resale service. A single deviation will only appear once on the differences list, in either Part 1, Part 2, Part 3, or Part 4. Information that exceeds the minimum requirements outlined in this section (e.g., supporting documentation and attachments) may be provided at the discretion of the Exchange Company. (R)
- 5.04 One differences list will be prepared. Each list will be provided three months prior to the effective date. For example, assume Version 27 is the current version and has an associated differences list. Three months prior to the effective date of Version 28, an additional differences list will be prepared for Version 28. Therefore, two lists will be maintained and provided until the implementation of Version 28. (R)
- 5.05 The most recent issue date will supersede any prior differences list for the same version number. For example, assume Version 12 is already in production. A differences list was prepared on 4/15/89 with a List Implementation Date of 7/1/89. A new differences list with an issue date of 5/10/89 was needed for an emergency tariff filing with a List Implementation Date of 6/1/89. All items that are to be effective on 7/1/89 that were on the first list must have the Item Implementation Date populated on the second difference list. (R)
- 5.06 All documentation relating to a difference will be presented on the form. This includes field characteristics, default values (when different from the normal), etc. (R)

DIFFERENCES LIST HEADING INFORMATION

- 5.07 The following paragraphs describe the information which will be displayed at the top of each page of the differences list.

Company Name

- 5.08 The identification of the EC submitting the differences list (e.g., Southwestern Bell).

DIFFERENCES LIST HEADING INFORMATION (Continued)**Version Number**

- 5.09 The CABS BOS version number in the header record (e.g., 10) which will become effective on the List Implementation Date (discussed below).

List Implementation Date

- 5.10 The date the new and changed differences on this list become effective (e.g., 7/1/97). Where release installation is under local control, this will represent a projected implementation date.

Issue Date

- 5.11 The date this version number list was prepared (e.g., 4/15/89).

Previous Issue Date

- 5.12 The previous issue date that the differences list for this version number was prepared (e.g., 2/15/89). If this is the first issuance of the differences list for a new version number, this field will be blank.

Reason for Issue

- 5.13 A brief explanation as to the reason the differences list was prepared. This will be a free flowing section that will denote such items as: OBF Issue Number Implementation, CABS BOS Version Number implementation, Tariff Items, Local CABS Release Number or other pertinent information that will briefly communicate the reason for the publication of the differences list.

CONTENT AND FORMAT

- 5.14 The BDT Differences List is comprised of four parts, with a page break between each part. (R)
- 5.15 Part 1 will be entitled RECORD SPACE DIFFERENCES. It will only be provided when an Exchange Company opens up existing reserved BDT record space for new entries. This also includes the activation of an existing indicator on the BDT that is labeled "reserved". This part will always contain the following information (unless noted optional):
- Tracking Number (optional)
 - Record Name
 - Record ID
 - Record Positions
 - Status
 - Standard Version #
 - Explanation of Difference (optional, conditional)
 - Item Implementation Date (optional, conditional)

The appearance and order of the columns are displayed on page 1 of attachment 1-5-1.

CONTENT AND FORMAT (Continued)

- 5.16 **Part 2** will be entitled REDEFINITION/ADDITIONAL VALUES/CODE SETS FOR EXISTING DATA ELEMENTS. This part will only be provided when elements and indicators have been added to existing fields or when definitions to existing fields have been modified. (Phrase Codes will not be presented under this part). The following information will be included (unless noted optional):
- Tracking Number (optional)
 - Data Element Name
 - Status
 - Standard Version #
 - Explanation of Difference (optional, conditional)
 - Item Implementation Date (optional, conditional)
- 5.17 The appearance and order of the columns are presented on page 2 of attachment 1-5-1.
- 5.18 **Part 3**, entitled NEW AND LOCAL USE PHRASE CODES, will describe all Telcordia temporary assigned and Local Use phrase codes. This part will consist of the following information (unless noted optional):
- Tracking Number (optional)
 - Phrase Code
 - Phrase
 - Status
 - Standard Version #
 - Explanation of Difference (optional, conditional)
 - Item Implementation Date (optional, conditional)
- 5.19 Refer to page 3 of Attachment 1-5-1 for the appearance and order of the columns displayed in Part 3.

CONTENT AND FORMAT (Continued)

5.20 **Part 4**, entitled LOCAL CALL PLAN TYPES, will describe all the local calling plan types associated with resale service. This part will consist of the following information, (unless noted optional): (R)

- Tracking Number (optional)
- Local Call Plan Type Ind
- Description
- Status
- Item Implementation Date (optional, conditional)

It should be noted that Local Call Plan Types will not be made standard. As such the Standard Version # is not provided for this part. These plans are numerous and unique to each company; in some cases they will be very short-lived. For these reasons, local call plan types will be assigned by each company and will represent a permanent difference.

5.21 Refer to page 4 of Attachment 1-5-1 for the appearance and order of the columns displayed in Part 4. (R)

5.22 Refer to Appendix 1 of this section for a detailed explanation of the information contained in the column fields discussed in the preceding paragraphs.

Listed below, in order of form appearance, is an explanation of the column fields described in this Section.

Tracking Number ①

This field represents the EC assigned number for the individual difference. It is an optional field.

Record Name ②

The name of the BDT record (e.g., Bill Pack Header).

Data Element Name ③

The name of the data element (e.g., Local Transport).

Phrase Code ④

The phrase code value (e.g., A01).

Record ID ⑤

The identification of the record by category, group, type and suffix (e.g., 10-01-01-00).

Phrase ⑥

The narrative of the phrase code.

Record Positions ⑦

The numeric positions of the data element field within the record (e.g., 142-144).

LCPT Ind ◆

The code (indicator) for the Local Call Plan (e.g., BS01). Note that the first two positions of this field will denote the company. For a listing of the company code set, please refer to the Local Call Plan Type Ind definition located in Volume 4 of these Specifications.

(R)

LCPT Description ▲

The narrative of the local call plan type.

(R)

Status®

A code which represents the status of the difference. An alphabetic code will identify the difference as new or changed. A numeric code will identify the reason for the difference. Listed below are the current valid values (in bold print) and an explanation of their use.

N: This value will be used to denote new information.

C: This value will be used to denote change to an existing difference(s). It will be displayed when a previously identified difference is being moved to a new location or otherwise modified. For example, if a field location was 69-72 and is now being moved to 78-81, this difference would be marked with a "C".

Status (Continued)

Blank: Used to denote that the difference was implemented on a prior list and the List Implementation date has passed.

1. Tariff/Regulatory requirements
2. Temporary Assignment from Telcordia
3. Standard not Implemented (used only when a standard applies to an EC and that EC does not implement)
4. Deviation made Standard
5. Miscellaneous

All applicable codes will be used to convey the status of a difference. For example, a new tariff filing that has received temporary assignment from Telcordia would contain the code set "N-1,2". When an item is made standard, the status code will contain only the code "4" (deviation made standard). The item will be removed from the differences list with the next update.

Once an item is marked as an "N", it will remain an "N" until that item is implemented as identified by the List or Item Implementation Date.

When an item is marked as a New difference on a production differences list and a new version number list is required, the status code will contain a blank if the item will have already been implemented by the effective date of the version number list.

Miscellaneous status will be used to denote local use records, information only items, etc. The reason for a miscellaneous code will be documented under the Explanations of Differences column.

Standard Version #⑨

For those items marked with a status code of 2 (Temporary Assignment from Telcordia), this will represent the earliest CABS BOS version number which may incorporate the difference. If the information is unavailable, this field will be blank.

Explanation of Difference ⑩

This column will contain an explanation of the difference which may include the following information:

- a) Description of difference
- b) Reason for difference
- c) Special conditions of use
- d) Data element definition
- e) Field characteristics and format of data, i.e. YYMMDD for dates
- f) Default Value (when different from the standard alpha and numeric default values)
- g) Value sets, elements, indicators, etc.
- h) Any other pertinent information which would assist the customer.

Item Impl. Date *⑪

This column will display the date the item becomes effective which may be the same as the List Implementation Date. This field is optional **unless** the date is later than the List Implementation Date.

CABS BOS DIFFERENCES LIST

Page ___ of ___

COMPANY NAME: _____
 REASON FOR ISSUE: _____

VERSION NO: _____
 LIST IMPLEMENTATION DATE: _____
 ISSUE DATE: _____
 PREVIOUS ISSUE DATE: _____

TRACKING NUMBER ①	RECORD NAME ②	RECORD ID ③	RECORD POSITIONS ⑦	⑧ STATUS	STANDARD VERSION # ⑨	EXPLANATION OF DIFFERENCE ⑩	ITEM IMPL. DATE *

Key to Status Codes : N - new difference. C - change to existing difference. 1 - tariff/regulatory requirements. 2 - temporary assignment from BCR. 3 - standard not implemented. 4- deviation made standard. 5 -miscellaneous, see explanation of difference.

Issued: 02-01-90

Revised: _____

Transmittal No: 42