

HOGAN & HARTSON

L.L.P.

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

September 4, 2002

EX PARTE

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 02-148 – Application of Qwest
Communications International Inc. to Provide In-Region,
InterLATA Services in the States of Colorado, Idaho,
Iowa, Nebraska and North Dakota**

**WC Docket No. 02-189 – Application of Qwest
Communications International Inc. to Provide In-Region,
InterLATA Services in the States of Montana, Utah,
Washington and Wyoming**

Dear Ms. Dortch:

In response to a request by Commission staff, Qwest Communications International Inc. (“Qwest”) describes here its recent experience issuing UNE-P bills in BOS format, including issues raised by Qwest’s most recent release, and, where appropriate, measures Qwest has – or plans to – undertake to address these issues. Qwest also describes here the available commercial data that pertains to the accuracy and completeness of Qwest’s UNE-P BOS bills, as well as a list of CLECs currently receiving UNE-P bills in BOS format.

As explained in Qwest’s recent filings with the Commission, Qwest notified CLECs on April 19, 2002, that it would make available Wholesale UNE-P bills in BOS format with a target production date as of

Letter to Ms. Dortch
September 4, 2002
Page 2

July 1, 2002.¹ Currently, only one CLEC (AT&T) has requested and received UNE-P bills in a BOS format; three UNE-P bills were rendered to AT&T in each of July and August, 2002.

Issues Raised

A description of the issues raised – and remedies undertaken by Qwest – in connection with the company's most recent issuance of UNE-P bills in BOS format appears below.

The following issues were identified in the July bills, and corrected before the August bills were sent:

- “Total usage” charges exceeded the sum of all the usage detail records on the account by \$8.30.
- Invalid “From” and “Through” dates were displayed in adjustment records.
- Not all CSRs were provided. Effective with August bills, Qwest instituted a manual process to ensure all CSR data is included. This process is scheduled for mechanization effective with the October bills.
- The second bill processed in one bill round inadvertently included subtotals from the first bill. This problem did not affect the totals listed or balance due on the second bill. Qwest fixed this one-time problem, and provided a corrected July bill to AT&T on July 30, 2002.
- On the July BOS bills, Qwest included surcharge detail records without a corresponding surcharge total. The surcharges, however, had already been included in the total tax amount. Qwest has since modified its code both to

¹ See, e.g., Reply Declaration of Lynn M V Notarianni & Christie L. Doherty, Operations Support Systems, WC Docket No. 02-189, filed Aug., 26, 2002.

Letter to Ms. Dortch
September 4, 2002
Page 3

identify and display the surcharges under the heading "Tax" to match the paper bill.

- The summary of monthly charges on the bill did not match the CSR data. The CSR included with the bill was inadvertently generated on a different day than the bill. Effective with August bills, Qwest implemented a manual process to ensure that the CSR pull date matches the bill pull date; Qwest is in the process of investigating a long-term mechanized fix.
- The 109999 trailer record included an incorrect suffix, resulting in a processing error for the customer. Qwest changed its code, and resent the bill files.
- Facility Charge and Summary Office indicators were not defaulted to the correct values.
- Directory advertising charges were erroneously included in the monthly charge amount, which caused an out-of-balance in the July bills. This inclusion was not unique to the BOS-formatted bill; directory advertising charges also were present on the paper bill. Qwest instituted a manual process to correct the affected accounts. A mechanized fix will be in place by the September bill release to stop the directory advertising charges from billing to a UNE account, both on paper and on BOS-formatted bills.

The following also occurred in the July and/or August bills, and are in the process of being corrected:

- In the Central Region, Qwest did not always provide a usage rate on the BOS bill. Qwest plans to correct this omission and expects to have a correction date identified by September 15, 2002.
- "From" and "Through" dates on fractionalized charges were not included.

Letter to Ms. Dortch
September 4, 2002
Page 4

- The August bill for the Western region was out of balance with the paper bill by \$0.99.
- The August bill for the Central region inadvertently included wireless and Internet charges that bypassed existing edits.

In an effort to assist CLECs in identifying nuances in Qwest's UNE-P BOS bills – and to ameliorate confusion that may arise – Qwest develops and continually updates a “Differences List” in a standard industry format to document instances in which Qwest's UNE-P BOS bills may differ from standard industry practices. By way of illustration, current excerpts from the Differences List include:

- When an account (Telephone Number (TN)) has been disconnected, no CSR data will be available even though there may be bill data. Therefore, the BDT file may contain Bill records (10-xx-xx) with no corresponding CSR records (40-xx-xx).
- Standard BOS edits will not be performed because IABS is simply formatting the BOS BDT records and does not have the data necessary to perform any edits.
- The elements “Adjustment From” date and “Adjustment Through” date will contain the bill date when Adjustment From Date and Adjustment Thru Date are unavailable.
- Usage Rate may default to zeros in situations where the data is not available.
- Audit Number will be defaulted to zeros on Adjustments (10-20-05).
- The elements “Monthly Charges Tax,” “Usage Tax” and “Other Tax” will default to zeros on Detail of Taxes (10-50-05).

A copy of the current Differences List (with columns not relevant to this ex parte appropriately redacted) can be found below.

Letter to Ms. Dortch
 September 4, 2002
 Page 5

Redefinition/Additional Values/Code Sets for Existing Data Elements

Data Element Name	Explanation of Difference
Activity Date	Bill Processing Date will be populated in Activity Date
Adjustment Thru Date	Will contain the bill date when Adjustment Thru Date is not available
Adjustment From Date	Will contain the bill date when Adjustment From Date is not available
Circuit Format Ind	Will contain spaces
Recurring/Non-recurring Charge Ind	Will always contain a value of '1'
Service Established Date	Bill Processing Date will be populated in Service Established Date field.
Total Taxes	Will include Surcharges when present
USOC/FID Ind	Will always contain the value of "2", indicating USOC. FID information is not available from the originating system.
Audit Number	Will contain zeros.
Usage Rate	May contain zeros when data is unavailable.
Usage Tax	Will contain zeros.
Other Tax	Will contain zeros.
Monthly Charges Tax	Will contain zeros.

New and Local Use Phrase Codes

Phrase Code	Phrase	Explanation of Differences
X15	Charge for Unbundled Services	Local Use Phrase for Unbundled products' OC&Cs
X18	Adjustment for Unbundled Services	Local Use Phrase for Unbundled Products' Adjustments

Commercial Data

Of the six UNE-P bills rendered in BOS format to date, three were sent within the ten day target defined in BI-2. A fourth was initially sent on time, but Qwest re-created it following the ten-day period, and thus counted it as late.

Letter to Ms. Dortch
September 4, 2002
Page 6

The accuracy and completeness of Qwest's UNE-P bills in BOS format were evaluated as part of BI-3A and BI-4A, respectively. Qwest does not evaluate its performance under these PIDs for UNE-P bills in BOS format alone. Nevertheless, the company's overall performance under these PIDs includes the bills it rendered in BOS format in July and August.

CLECs Receiving UNE-P Bills in BOS Format

As noted above, AT&T is the only CLEC currently receiving BOS-formatted UNE-P bills.

* * *

The twenty-page limit does not apply to this filing.

Respectfully submitted,



Yaron Dori

cc: M. Carowitz
E. Yockus
G. Remondino
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Myles
J. Stanley
S. Vick
J. Orchard
C. Washburn
S. Oxley