

ORIGINAL



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RECEIVED

October 22, 2002

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Ex Parte

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Application by Verizon for Authorization To Provide In-Region, InterLATA Services in State of Virginia, WC Docket No. 02-214 - REDACTED

Dear Ms. Dortch:

This letter responds to Cavalier's ex parte, dated October 14, 2002, concerning billing data for traffic routed through Verizon's tandem switches. Cavalier acknowledges that its billing concern "is not just a problem between Cavalier and Verizon, but is an industry wide problem that defies correction, as witnessed in the published OBF's meeting notes." Cavalier Oct. 14 Ex Parte at 1-2 (footnote omitted). Cavalier nevertheless faults Verizon for not single handedly solving this industry issue. *Id.* at 2. This makes no sense, and is not a basis for denying Verizon's 271 application for Virginia.

Cavalier claims that Verizon fails to populate Carrier Identification Codes (CIC) on certain records, provides incomplete information, fails to provide call detail records as requested by Cavalier, and routes traffic over incorrect trunk groups. Cavalier's claims are without merit,

Population of Carrier Identification Code and Operating Company Number: The Carrier Identification Code is a numerical code used to identify interexchange carriers. The CIC is provided to Cavalier on all records for calls delivered to Verizon over trunks with a valid assigned CIC code. In addition, the record also contains a field for the Originating Operating Company Number (OCN). Verizon provides the OCN instead of a CIC on calls delivered to Verizon over a local trunk group by a CLEC using a pseudo 9000 CIC. The pseudo 9000 CIC is assigned to local trunk groups for CLECs that do not have a CIC because they are not an interexchange carrier. In these cases the OCN should be used to identify the originating carrier. Verizon provides either a CIC or an OCN. As discussed further below, there are some instances in which, because of unavailability of information from the originating carrier or technical limitations in the switch, Verizon cannot populate the correct originating OCN on a call record. In those cases, however, the originating carrier's CIC is populated, so the terminating carrier (Cavalier, in this case) can determine which carrier to bill. Attachment I is an excerpt from the

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REDACTED - FOR PUBLIC INSPECTION

3,000+ page attachment to Cavalier's September 20, 2002 **Ex Parte** showing "one page" of call records ("one page" takes eight printed pages to show all the columns). The **CIC** for each call appears in the **CarrierID** column on page 2 of Attachment 1; the **OCN** appears in the **OrigOCN** column on page 8 of Attachment 1.

Information on 110101 Records: Cavalier's claim of "incomplete" information on 110101 records is apparently related to instances where the "from **NPA/NXX**" is the same as the "to **NPA/NXX**" or to instances where the originating number is populated with "999999." *See* Oct. 14 **Ex Parte**, attachment. These occurrences are the result of incomplete information from the originating carrier or switch limitations:

- One-Way Trunks – Verizon passes on to Cavalier (and other terminating carriers that receive tandem transit records) all of the information transmitted by the originating carrier. A number of carriers do not supply the originating telephone number when they send a call to Verizon's tandem. Because Verizon understood that some carrier billing systems could not process call records where the originating number field is not populated, it has been Verizon's long-standing practice in Virginia and other former Bell Atlantic-South jurisdictions to populate the originating number field in 110101 records with the terminating number. In these instances, the incomplete information is the result of incomplete information sent to Verizon by the originating carrier. Cavalier is not prevented from processing these call records; instead, the presence of the terminating number in the originating number field is a flag that the call may need to be billed according to the **PIU/PLU** factors Cavalier has negotiated with the originating carrier.

On these calls, the **OCN** for the originating carrier is correctly populated when the originating Local Routing Number is sent with the call from the originating carrier, or when the call is sent to Verizon over a local trunk using a pseudo 9000 **CIC**. Verizon can then translate this information into the originating carrier's **OCN** and populate the **OCN** on the 110101 record. Where the **LRN** is not present and the call is sent to Verizon over an access trunk, however, Verizon must derive the **OCN**. As a result of the resolution of **OBF Issue 1921**, Verizon's system now attempts to derive the originating **OCN** from the originating telephone number. In the situation described above, this results in the **OCN** either being the terminating carrier's **OCN** or, in the case of a ported number, the switch owner's **OCN**. In these cases, the correct originating carrier **CIC** is nevertheless present on the 110101 record.

- Two-Way Trunks – When a call is delivered to the Verizon tandem over a two-way trunk in the former Bell Atlantic-South, there are switch limitations on the Carrier Network Access Record (**CNAR**) that is created. **CNAR** records do not contain a field for the **CIC**. In order to capture the identification of the originating carrier, Verizon's switch overwrites the originating telephone number with "999999 plus the originating carrier's **CIC**. Again, in this situation, the call should be billed according to the **PIU/PLU** factors Cavalier has negotiated with the originating carrier.
- **PIU/PLU** Factors – Verizon does not always receive complete call information from the originating carrier, so it is not always possible for Verizon (or another carrier to whom

Verizon passes the information) to determine whether a call is local or access. As a result, carriers should have agreements setting "percent local usage" ("PLU") and "percent interstate usage" ("PIU") factors to use when actual jurisdiction cannot be determined. Verizon has such arrangements with carriers with which it exchanges traffic.

Call Detail Records (CDRs): This is a new issue raised by Cavalier for the first time in its October 14 Ex Parte. Verizon requested CDRs from Cavalier to verify the jurisdiction of intrastate calls that Cavalier billed to Verizon. Under its interconnection agreement, Cavalier has the right to bill Verizon based on the jurisdiction of actual calls (rather than a factor) if the originating carrier provides the calling party number (CPN). Verizon provides CPN when it is the originating carrier. Therefore, Cavalier can bill Verizon for intralata toll access or local termination charges using the originating and terminating numbers instead of the Verizon-supplied PLU. Verizon requested the CDRs to conduct a PLU study to verify that Cavalier was correctly billing Verizon, because the percentage of intraLATA toll traffic billed to Verizon was higher than we would have expected. (While Cavalier did provide CDRs, they were not usable in the form provided; Verizon has requested that Cavalier resubmit the CDRs, but has not yet received them.) On the other hand, when Verizon bills Cavalier, we use the PLU factor supplied by Cavalier to determine the jurisdiction of the calls. As a result, there is no need to provide records to verify that Verizon is billing Cavalier access or local termination correctly, because we are billing Cavalier according to the factors supplied by Cavalier.

Routing Traffic Over Trunk Groups: This is a new issue raised by Cavalier for the first time in its October 14 Ex Parte. Verizon can find no evidence of a problem with the trunks routing traffic to Cavalier. Verizon has checked the translations for routing traffic to Cavalier and found that access traffic is being routed over access toll connecting trunk groups while intraLATA toll and local traffic is being routed over traffic exchange trunk groups, as is appropriate. As explained above, Verizon provides Cavalier with either the OCN or the CIC of the originating carrier for each call record, so Cavalier can determine which carrier to bill. To the extent Cavalier is unable to determine the jurisdiction of the calls from a particular carrier, it should bill using factors provided by that carrier, similar to the way Verizon bills Cavalier.

The attachment contains proprietary information and has been redacted. A confidential version is also being filed with the attachment. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 02-1857.

Sincerely,



cc: U. Onyeije
B. Olson
G. Rernondino
I. Dillner