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Cronan O'Connell
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EX PARTE

September 10, 2003

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: *In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128

Dear Ms. Dortch:

On September 8, 2003, as a follow-up to Qwest Communications International Inc.'s ("Qwest") August 27, 2003 *ex parte*, representatives of Qwest, Cronan O'Connell, Aimee Jimenez and Glenda Weibel, met via telephone with Henry Thaggert and Greg Cooke of the Federal Communications Commission's Wireline Competition Bureau to discuss issues concerning the above-captioned proceeding.

The attached document is responsive to questions raised by Commission staff with regard to the timeframe which would be required to implement Qwest's certification proposal. Further, in a follow-up conversation with Darryl Cooper, of the Wireline Competition Bureau, he requested that Qwest identify the full call detail record data elements that Qwest identifies in Section V.a. of the August 27, 2003 *ex parte*.

In accordance with Commission Rule 47 C.F.R. § 1.49(f), this *ex parte* is being filed electronically via the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced proceeding pursuant to Commission Rule 47 C.F.R. § 1.1206(b)(2).

Sincerely,

/s/ Cronan O'Connell

cc: Jeffrey Carlisle (via e-mail at jeffrey.carlisle@fcc.gov)
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Greg Cooke (via e-mail at greg.cooke@fcc.gov)

Qwest Discussion – Docket No. 96-128
Additional Issues as Updated on September 10, 2003
(Additions and Changes from August 227th Ex Parte in bold)

- I. Qwest is ideally situated to propose a solution to the Commission:
 - a. Qwest is one of the largest PSPs as well as the one of the largest IXC's
 - b. This proposal is a result of efforts to reconcile the conflicting interests of PSPs and IXC's as well as weighing the concerns of other business units affected by the payphone compensation rules (*e.g.*, LEC, SBR, prepaid calling card provider).

- II. The payphone compensation rules are ineffective because:
 - a. The SBRs have no incentives to accurately report the number of calls that were completed (*i.e.*, answered by the called party).

- III. Therefore, at a minimum, any Rule adopted by the Commission must include the following carrier obligation:
 - a. Annual *certification* from each carrier's corporate officer including:
 1. The number of calls for which that carrier paid compensation to the PSP (or paid a surcharge to the IXC, identifying the number of calls for each IXC) broken down by quarter.
 - i. **Qwest Response: Qwest IXC currently has this information available from its clearinghouse.**
 2. The number of calls on which the carrier charged its customers a surcharge (and for IXC's, identifying the number of calls for each reseller customer), broken down by quarter.
 - i. **Qwest Response: Qwest IXC has this information available today only for the small number of SBRs that participate in the true-up process. Currently, Qwest IXC can only extract this information from its systems on a manual basis. It will take Qwest IXC a minimum of nine months to have a process in place that allows it to record and extract reseller-specific information for all of its SBRs in a fully mechanized fashion.**
 3. Require that untimely certifications be subject to fines.
 4. Require that submission of false data would be processed through an enforcement and penalty scheme.
 5. This attestation should eliminate the financial incentive a reseller may have to misreport call completion numbers to the IXC or PSP.

- IV. Should the Commission readopt the "First Switch" Rule, in addition to *certification*, the following obligation should apply:
 - a. SBRs be required to provide call completion data to IXC's in the same quarter in which payment to the PSP is processed.
 - i. **Qwest Response: Qwest would like to clarify that in some instances the SBR may not choose to participate in a true-up process with its first-switch IXC due to its high completion call rate.**

ATTACHMENT 1

QWEST TRUE-UP PROCESS FOR PER-CALL COMPENSATION

Modified EMI Format

DETAIL RECORD

Field Name	Position	Length	Data
RecordID	1	6	"RD" followed by 4 spaces
Call Date	7	6	yymmdd
	13	2	filler
ANI	15	10	Payphone ANI
	25	5	filler
Access Code/Number	30	10	'xxx' of a 1010xxx access code or the actual 800 (8xx, 9xx) access number
	40	15	filler
Connect Time	55	6	hhmmss
Reported Time	61	6	length of call in seconds
	67	15	Filler
Contract Flag	82	1	put "0" in this field
	83	71	filler
Info Dig	154	2	Info Digit
Reseller ID No.	156	20	Reseller ID No.

ATTACHMENT 2

INTERNET

Company Name: Switch-based Reseller XYZ

Company Contact: Jane Doe, 123-456-7890

800-XXX-XXXX	800-XXX-XXXX	800-XXX-XXXX

Company Name: Switch-based Reseller ABC

Company Contact: John Doe, 456-789-0123

800-XXX-XXXX	800-XXX-XXXX	800-XXX-XXXX
800-XXX-XXXX	800-XXX-XXXX	800-XXX-XXXX
800-XXX-XXXX	800-XXX-XXXX	800-XXX-XXXX
800-XXX-XXXX	800-XXX-XXXX	800-XXX-XXXX