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December 19, 2007
Via Overnight Delivery and Electronic Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743
Attention: Office of the Secretary

RE: CC Docket No. 96-128; 2007 Audit Report and Letter of Attestation of Dollar Phone Corp.

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.1320(f), enclosed on behalf of Dollar Phone Corp. is the 2007 Management Report on Compliance with Applicable Requirements and Letter of Attestation by an Independent Third-Party Auditor concerning Dollar Phone's compliance with the Commission's Payphone Compensation Rules.

Pursuant to 47 C.F.R. §64.1320(e), following is the contact information for persons responsible for handling payphone compensation and for resolving disputes with payphone service providers.

Primary Contact:	BSG Clearing Solutions, Inc. Attention: Peggy Gaitan 7411 John Smith Drive, Suite 200 San Antonio, TX 78229 (210) 949-7109
Secondary Contact:	Dollar Phone Corp. Attention: Eitan Kimelman 232 Broadway Brooklyn, NY 11211 (718) 889-1124

In accordance with the Commission's rules, this Letter of Attestation and Management Report are being provided to each Payphone Service Provider for which Dollar Phone completes calls and with each facilities-based long distance carrier from which it receives payphone calls.

Please acknowledge receipt of this filing by returning a date stamped copy of the enclosed cover letter duplicate in the return self-addresses, stamped envelope that is provided for this purpose. Any questions regarding this filing may be addressed to the undersigned by calling (407) 740-3031 or via email at sthomas@tminc.com.

Sincerely,

Sharon Thomas, Consultant to
Dollar Phone Corp.

Enclosures

cc: E. Kimelman
file: Dollar Phone - FCC
tms: FCCx0701

Attestation of the Independent Auditor
To the Management of
Dollar Phone Corp.
Brooklyn, New York, USA

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In the matter of	)	
	)	
Conformance to the Pay Telephone	)	*October* 2007
Reclassification & Compensation Provisions of	)	
The Telecommunications Act of 1996	)	
FCC 03-235	)	

Letter of Attestation

We have examined management's assertions, included in the accompanying **"Dollar Phone Corp. Management Report on Compliance with Applicable Requirements of the FCC's Rules and Regulations"**, that it believes that, for the period July 1, 2006, through June 30, 2007, Dollar Phone Corp's controls over its review methods, procedures and systems deployed for compliance with FCC Dial-Around Compensation (DAC) requirements, are effective in providing reasonable assurance that FCC reporting requirements are properly followed, summarized and reported to Payphone Service Providers (PSP's). Dollar Phone Corp's management is responsible for maintaining effective controls over its measurement and reporting function. Our responsibility is to express an opinion on management's assertion based on our examination.

Further, we have examined management's assertions Dollar Phone Corp. is in compliance with FCC 03-235/CC Docket No. 96-128, and FCC 04-251/CC Docket No. 96-128:

- FCC 03-235/CC Docket No. 96-128 provides that the completing carriers are responsible for payment of payphone compensation charges; must provide the PSP's with quarterly sworn statements by the CFO of payphone compensation charges accuracy; and must provide to PSP's quarterly reports of 8XX calls completed by the carrier.
- FCC 04-251/CC Docket No. 96-128 states that completing carriers are responsible for retaining records of payments of payphone compensation for 27 months and are responsible for providing quarterly reports of 8XX numbers completed by the carrier.

Our examination was conducted in general accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and those of GAO Government Accounting Standards (GAGAS) and, as required, included obtaining an understanding of the controls over review methods, procedures and systems deployed by

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management for compliance with FCC requirements, testing, and evaluating the design and operating effectiveness of those controls, and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Because of inherent limitations in controls, errors or fraud may occur, and not be detected. Also, projections of any evaluation of controls over the measurement and reporting function to future periods are subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Dollar Phone Corp management is responsible for compliance with the requirements. Our responsibility is to express an opinion on management's assertions about Dollar Phone Corp's compliance based on our examination.

In our opinion, management's assertion, that it believes that, as of October 30, 2007, Dollar Phone Corp's controls over its measurement and reporting function as it relates to review methods, procedures and systems deployed by management for compliance with FCC requirements are effective in providing reasonable assurance that FCC requirements are properly recorded, summarized and reported, is fairly stated, in all material respects, based on the criteria specified in management's report.

This report is intended for compliance purposes, and, as such, the information contained herein and its use is solely at the discretion of Dollar Phone Corp's management. It is not to be construed as a legal opinion.

By: _____,

I. Nicholas Phelan
Managing Partner

October 30, 2007

Princeton Associates, LLC
Phoenix, Arizona, USA

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DollarPhone

Dollar Phone Corp.

Management Report on Compliance with Applicable Requirements

of the

FCC's Rules and Regulations

Section 64.1310(a)(l)
In the Matter of
the Pay Telephone Reclassification
and Compensation Provisions of
The Telecommunications Act of 1996

Revision A

September , 2007

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I. INTRODUCTION

Since the implementation of the Telecommunications Act of 1996, there have been ongoing discussions among carriers ("Inter Exchange Carriers"[1] and "Completing Carriers") and payphone service providers (PSPs) as to how best to ensure PSPs are fairly compensated for all completed coinless calls originating from their payphones.

On September 30, 2003, the Federal Communications Commission (FCC) released its Report and Order in CC Docket No. 96-128 (FCC 03-235) titled *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996.* In this latest ruling, the FCC adopted new payphone compensation rules.

These rules place responsibility on the completing carrier to establish a call-tracking system and to compensate PSPs for coinless payphone-originated calls that are completed by that carrier. Carriers are required to

- establish call tracking systems,
- have an independent third-party auditor attest that the system accurately tracks payphone calls to completion, and
- pay PSPs directly, based on the carrier's own call tracking data.

The FCC rules also define new reporting requirements for intermediate carriers, although no attestation is required.

The requirements set forth by the FCC take effect the first day of the first full quarter after the new rules became effective. These rules became effective July 1, 2004.

[1] IXC's Inter-Exchange Carrier

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Dollar Phone Corp.

Information taken completely from www.DollarPhone.com
This section is for information only.
It has no bearing whatsoever on the rest of this audit material.

Since beginning operations in 1999, Dollar has evolved into a company known for its superior product, impeccable quality and very competitive pricing. The former being the three cardinal principles upon which Dollar built its business model and thus its employees', vendors' and distributors' trust and confidence. Dollar has metamorphosed from its early days of simply being a small pre-paid phone card distributor to a multinational corporation offering telecom services to the prepaid phone card industry as well as a serious player in the wholesale field of telecommunications, servicing recognized conglomerates such as IDT, Bezeq International, Singapore Telecom, Arbinet, Teleglobe, Reach USA and a host of others via its own switch platform.

Headquartered in Brooklyn, NY, Dollar Phone is an established leader in telecommunications, specializing in origination, termination and the wholesale distribution of pre-paid phone cards. A distinct carrier service renowned for always putting its customers first, Dollar Phone provides access to superior, affordable telecommunications products and services around the globe. With its advanced infrastructure, Dollar Phone has the ability to offer its clients fast and efficient service regardless where the client is located.

Dedicated to meeting the complex needs of all its clients, Dollar Phone has incorporated a world-class staff of courteous, live 24-hour, multilingual, customer service representatives assisting its national distribution network. Currently, Dollar Phone has a network of distributors offering more than 550 different prepaid products in over 150,000 retail outlets throughout the United States and Canada.

Dollar's reputation for its quality control in technology and customer service propelled it to one of the industry's leaders. With its quick-response manual and automated multilingual customer service, Dollar provides its clients with optimum quality.

> *Dollar's IT and Technical departments are not only concerned with maintaining the current quality of service provided, and constantly vigilant of routing all telecom via the most optimal carriers both fiscally and practically, but also utilize and continuously upgrade the finest and most unique software programs in the telecom industry..*

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II. BACKGROUND

Prior to the new rules becoming effective, carriers were required to follow the rules as set forth in the FCC's previously issued Second Order on Reconsideration (CC Docket No. 96-128). released April 5, 2001 "New rules ensure competing payphone providers are compensated for coinless calls". For many carriers, current network and billing system processes and procedures implemented to comply with the Second Order of Reconsideration may already support compliance with portions of the FCC's latest ruling. However, when the new rules became effective, carriers were required to implement a more detailed level of data gathering, analysis, storage, and reporting, as well as monitor compliance with the new rules.

Each completing carrier will be required to file a report from the independent auditor regarding the completing carrier's compliance with the FCC's rules by the effective date of such rules. Generally consistent with standards established by the American Institute of Certified Public Accounts (AICPA) and/or USG GAO GAGAS[2] for attestation engagements, the System Audit Report shall consist of:

(1) The completing carrier's representation concerning its compliance, and
(2) The independent auditor's opinion concerning the completing carrier's representation of compliance. [3]

This report must be filed with the FCC Commission's Secretary in CC Docket No. 96-128 and made available to each PSP[4] for which the completing carrier completes calls and with each facilities-based long distance carrier from which it receives payphone calls.[5]

---

[2] Standards for financial audits issued by the Comptroller General of the United States through the U.S. Government Accountability Office

[3]

Section 64.1300:
(a) Except as provided herein, the first facilities-based interexchange carrier to which a completed coinless access code or subscriber toll-free payphone call is delivered by the local exchange carrier shall compensate the payphone service provider for the call at a rate agreed upon by the parties by contract.

Section 26.1310:
(a) It is the responsibility of the first facilities-based interexchange carrier to which a compensable coinless access code or subscriber toll-free payphone call is delivered by the local exchange carrier to track, or arrange for the tracking of, each such call so that it may accurately compute the compensation required by Section 64.1300(a). The first facilities-based interexchange carrier to which a compensable coinless payphone call is delivered by the local exchange carrier must also send back to each payphone service provider at the time dial around compensation is due to be paid a statement in computer readable format indicating the toll-free and access code numbers that the LEC has delivered to the carrier, and the volume of calls for each toll-free and access number each carrier has received for each of that payphone service provider's payphones, unless the payphone service provider agrees to other arrangements.

Section 64.1310
(b) The first facilities-based interexchange carrier to which a compensable coinless payphone call is delivered by the local exchange carrier may obtain reimbursement from its reseller and debit card customers for the compensation amounts paid to payphone service providers for calls carried on their account and for the cost of tracking compensable calls. Facilities-based carriers and resellers may establish or continue any other arrangements that they have with payphone service providers for the billing and collection of compensation for calls subject to Section 64.1300(a), if the involved payphones service providers so agree.

[4] PSP: Payphone Service Provider – owner of pay phone

[5] Please see Appendix B, 64.1310 Payphone compensation procedures.

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III. – FCC REQUIREMENTS for COMPLIANCE

The FCC has set down specific directives for reporting compliance with the rules.

§ 64.1320 Payphone Call Tracking System Audits.

(a) As a precondition to tendering payment pursuant to section 64.1310(a), all Completing Carriers must undergo a system audit of their section 64.1310(a)(1) tracking system by an independent third party auditor whose responsibility shall be, using audit methods approved by the American Institute for Certified Public Accountants, to determine whether the call tracking system accurately tracks payphone calls to completion.
(b) By the effective date of these rules, each Completing Carrier in paragraph (a) must file an audit report from the auditor (the "System Audit Report") regarding the Completing Carrier's compliance with section 64.1310(a)(1) as of the date of the audit with the Commission's Secretary in CC Docket No. 96-128 and with each payphone service provider for which it completes calls and with each facilities-based long distance carrier from which it receives payphone calls.
(c) The Completing Carrier must comply with, and the third-party auditor must verify, the Completing Carrier's compliance with the following factors in establishing a call tracking system pursuant to section 64.1310(a)(1):

(1) Whether the Completing Carrier's procedures accurately track calls to completion;
(2) Whether the Completing Carrier has a person or persons responsible for tracking, compensating, and resolving disputes concerning payphone completed calls;
(3) Whether the Completing Carrier has effective data monitoring procedures;
(4) Whether the Completing Carrier adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability;
(5) Whether the Completing Carrier has created a compensable payphone call file by matching call detail records against payphone identifiers;
(6) Whether the Completing Carrier has procedures to incorporate call data into required reports;
(7) Whether the Completing Carrier has implemented procedures and controls needed to resolve payphone compensation disputes;
(8) Whether the independent third-party auditor can test all critical controls and procedures to verify that errors are insubstantial; and
(9) Whether the Completing Carriers has in place adequate and effective business rules for implementing and paying payphone compensation, including rules used to:

(i) identify calls originated from payphones;
(ii) identify compensable payphone calls;
(iii) identify incomplete or otherwise non-compensable calls; and
(iv) determine the identities of the payphone service providers to which the Completing Carrier owes compensation.

(d) Consistent with standards established by the American Institute of Certified Public Accounts for attestation engagements, the System Audit Report shall consist of:

(1) the Completing Carrier's representation concerning its compliance; and
(2) the independent auditor's opinion concerning the Completing Carrier's

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representation of compliance. The Completing Carrier's representation must disclose

(i) its criteria for identifying calls originating from payphones;

(ii) its criteria for identifying compensable payphone calls;

(iii) its criteria for identifying incomplete or otherwise noncompensable calls;

(iv) its criteria used to determine the identities of the payphone service providers to which the completing carrier owes compensation;

(v) the identity of any clearinghouses the Completing Carrier uses; and

(vi) the types of information that the Completing Carrier needs from the payphone service providers in order to compensate them.

(e) At the time of the filing of System Audit Report with the Commission, the Completing Carrier shall file with the Commission's Secretary, and the facilities-based long distance carriers and payphone service providers identified in section 64.1320(b), a statement that includes the name of the Completing Carrier, and the name, address and phone number for the person or persons responsible for handling the Completing Carrier's payphone compensation and for resolving disputes with payphone service providers over compensation, and this statement shall be updated within 60 days of any changes of such persons.

(f) One year after the filing of the System Audit Report, and annually thereafter, the Completing Carrier shall engage an independent third-party auditor to:

(1) verify that no material changes have occurred concerning the Completing Carrier's compliance with the criteria of the prior year's System Audit Report; or

(2) if a material change has occurred concerning the Completing Carrier's compliance with the prior year's System Audit Report, verify that the material changes do not affect compliance with the audit criteria set forth in subparagraph (c). The Completing Carrier must fully disclose any material changes concerning its call tracking system in its representation to the auditor. The Completing Carrier shall file and provide copies of all System Audit Reports pursuant to the procedures set forth in subparagraph (b).

(g) Subject to protections safeguarding the auditor's and the Completing Carrier's confidential and proprietary information, the Completing Carrier shall provide, upon request, to the payphone service provider for inspection any documents, including working papers, underlying the System

The management of Dollar Phone is responsible for establishing and maintaining adequate systems and processes for its payphone call tracking system, and for ensuring Dollar Phone's compliance with the applicable requirements of Section 64.1310(a)(l) of the FCC Report and Order in CC Docket No. 96-128, released on October 3, 2003, regarding *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996* as referenced above

Dollar Phone management has performed an evaluation of the company's compliance with the applicable requirements of CC Docket No. 96-128 using the criteria in 64.1320(c) as the framework for the evaluation.

Based on this evaluation, we assert that for the audit period July 1, 2006, through June 30, 2007, and as of September 30, 2007, Dollar Phone complies with all applicable requirements of CC Docket No. 96-128.

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As required, we have prepared the required assertion statements relating to Dollar Phone's Payphone Call Tracking Systems.

Dollar Phone is acknowledged as the "Completing Carrier" in the following call scenarios:

- Call Type 1 (Completed by Dollar Phone) - Received via IXCs
- Call Type 2 (Completed by Dollar Phone) - Received via PSP contract
- Call Type 3 (Completed by Dollar Phone) - Received via LEC Feature Group

All assertions for Dollar Phone are from the point Dollar Phone has visibility to the call tracking data.

Dollar Phone had no ACA's (Alternative Compensation Agreements)[6] as defined by the rules with any PSP as of June, 2007.

Dollar Phone receives some PSP calls via LEC. However, as Dollar Phone has no ACA's in place, callers using local PSP-provided payphones must deposit whatever (cash/coin) amount the PSP has programmed into the individual payphone in order to make a local call, and, ultimately, to connect to Dollar Phone. Those calls are not a consideration, and are not required to be considered, in this audit. To the extent any dial-around calls are routed via LEC to Dollar Phone, such calls are identified in the same manner as Call Type 1 calls.

All potentially compensable calls received at Dollar Phone' switches are delivered by Dollar Phone's IXC's.

Dollar Phone Corp has signed a contract with BSG Clearing Solutions, Inc. – formerly Billing Concepts Inc. of San Antonio, TX ("BCI") – for payphone compensation settlement with PSP's. BSG is a nationally known payphone compensation clearinghouse.

[6] The rules also permit Completing Carriers and PSPs to opt out of the rules. A Completing Carrier may employ alternative reporting and compensation arrangements, other than those mandated by the rules, so long as the PSP agrees to these arrangements.

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IV. MANAGEMENT ASSERTIONS

To comply with FCC regulations, Dollar Phone makes the following assertions, where Dollar Phone is identified as the Completing Carrier:

FCC compliance § 64.1320(c) Subsection (1) – *Whether the Completing Carrier's procedures accurately track calls to completion*

- Dollar Phone's definition of the "per-call rate" of $0.24 is in compliance with prior (as of July 2004) FCC rules for compensation for those periods.
- Dollar Phone's definition of the "per-call rate" of $0.494 is in compliance with current (as of December 22, 2005) FCC rules.
- Dollar Phone's definition of a "Compensable Call" (payphone-originated call that completes over Dollar Phone' network in which Dollar Phone identifies itself as the Completing Carrier) is in compliance with the FCC rules[7].
- Dollar Phone's definition of a "Completed Call" (call that is answered by the called party) is in compliance with the FCC rules.
- Dollar Phone's systems, or its contracted partner systems, are able to generate the following reports, on a monthly, quarterly, or on-demand, basis:
    - A list of the toll free and access numbers dialed, and completed, from each PSP's payphones, with the ANI for each payphone.
    - The volume of calls for each toll free, and access, number that was completed by Dollar Phone.
    - The names, addresses, and phone numbers of the persons responsible for handling Dollar Phone's payphone compensation.
    - The CIC code, or Trunk routing group, of all facilities based LD carriers that routed calls to Dollar Phone categorized according to toll-free and access code numbers.
- Dollar Phone's data storage requirement is in compliance with FCC rules.*
- Dollar Phone's systems procedures for identifying PSPs are complete and have accurate rules.
- Dollar Phone's procedures for validating payphone ANIs are complete and have accurate rules.

FCC compliance § 64.1320(c) subsection (2) – *Whether the Completing Carrier has a person or persons responsible for tracking, compensating, and resolving disputes concerning payphone completed calls.*

- Dollar Phone has designated personnel responsible for drafting the business requirements associated with tracking, compensating, and resolving disputes concerning payphone-compensated calls rules.
- Dollar Phone has designated personnel responsible for the development and maintenance of systems used in the collection and reporting of payphone call data.
- Dollar Phone has designated personnel responsible for the implementation and maintenance of procedures that are utilized in creating final compensation data rules.

[7] See Appendix for definitions

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- Dollar Phone has designated personnel who are responsible for developing compensation-tracking reports.
- Dollar Phone has designated personnel who are responsible for payphone compensation dispute resolution.

FCC compliance § 64.1320(c) subsection (3) – *Whether the Completing Carrier has effective data monitoring procedures.*

- Dollar Phone has the ability to prepare monthly, quarterly, or ad hoc, reports on payphone call counts, PSP identities and numbers-dialed.
- Dollar Phone performs data monitoring procedures on call record volumes entering the payphone compensation systems.
- Dollar Phone has the ability to produce trend reports of excluded calls.
- Dollar Phone performs fraud-monitoring procedures to identify potentially illegitimate payphones.
- Dollar Phone has the ability to investigate and resolve PSP disputes.

FCC compliance § 64.1320(c) subsection (4) – *Whether the Completing Carrier adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability*

- Dollar Phone has documented security controls in place to control access to, and monitor, call-tracking data.
- Dollar Phone has documented security controls in place to control access to, and monitor, the payment disbursement system rules.
- Dollar Phone has a department responsible for making software changes that affect payphone compensation.
- Dollar Phone has established protocols to implement and test software changes affecting payphone compensation.
- Dollar Phone has application controls in place to ensure that network changes, external to payphone compensation, do not negatively impact payphone compensation.

FCC compliance § 64.1320(c) subsection (5) - *Whether the Completing Carrier has created a compensable payphone call file by matching call detail records against payphone identifiers.*

- Dollar Phone utilizes switch data and industry standard SQL[8] to populate the date, originating ANI, dialed number, and aggregate data into a Compensable Call File.
- Dollar Phone uses payphone specific identifiers (info digits) to identify a compensable payphone call record.

[8] SQL (Structured Query Language) A specialized language for sending queries to databases. Most industrial-strength data bases and many smaller database applications can be addressed using SQL. Each specific application will have its own slightly different version of SQL implementing features unique to that application, but all SQL-capable databases support a common subset of SQL strength and many smaller database applications can be addressed using SQL. Each specific application will have its own slightly different version of SQL implementing features unique to that application, but all SQL-capable databases support a common subset of SQL

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- Dollar Phone applies validation and control procedures to compile the Compensable Call File.

FCC compliance § 64.1320(c) subsection (6) - *Whether the Completing Carrier has procedures to incorporate call data into required reports.*

- Dollar Phone' SQL systems, or its contracted partner systems, are able to generate the following reports on a quarterly basis:
  - A list of the toll free and access numbers dialed and completed from each PSP's payphones, along with the ANI for each payphone except as noted in the details section.
  - The volume of calls for each toll free and access number that was completed by Dollar Phone's switches.
  - The CIC code or Trunk routing group of all facilities based LD carriers that routed calls to Dollar Phone' switches categorized according to toll-free and access code numbers
- Dollar Phone, or its contracted partner systems, possess a valid list of payphone owners identified by ANI.
- Dollar Phone has a system listing the names, addresses, and phone numbers of the person(s) responsible for handling payphone compensation.

FCC compliance § 64.1320(c) subsection (7) - *Whether the Completing Carrier has implemented procedures and controls needed to resolve payphone compensation disputes.*

- Dollar Phone maintains required call tracking data (archival information) from at least 27 months back.
- Dollar Phone has the ability to investigate and resolve PSP disputes.
- Dollar Phone has designated personnel who are responsible for payphone compensation dispute resolution.

FCC compliance § 64.1320(c) subsection (8) - *Whether the independent third-party auditor can test all critical controls and procedures to verify that errors are insubstantial.*

- Dollar Phone has procedures to identify payphone-originated calls.
- Dollar Phone has procedures to capture dial-around calls.
- Dollar Phone has procedures to exclude incomplete calls from the compensable call file.
- Dollar Phone has procedures to accurately populate call record data in the compensable call file.
- Dollar Phone has procedures to exclude commissioned calls from the compensable call file.

FCC compliance § 64.1320(c) subsection (9) - *Whether the Completing Carriers has in place adequate and effective business rules for implementing and paying payphone compensation, including rules used to:*

(i) identify calls which originated from payphones;
(ii) identify compensable payphone calls;
(iii) identify incomplete or otherwise non-compensable calls; and

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(iv) determine the identities of the payphone service providers to which the Completing Carrier owes compensation.

- Dollar Phone has business rules that identify calls originated from payphones.
- Dollar Phone has business rules that identify compensable payphone calls.
- Dollar Phone has business rules that exclude incomplete calls.
- Dollar Phone has business rules to determine the identities of the payphone service providers to which Dollar Phone owes compensation.

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V. REQUIRED DISCLOSURES

Dollar Phone' required disclosures per FCC 64.1320(d)

- Dollar Phone' criteria for identifying calls originating from payphones include call record info-digit identification numbers "27", "29" or "70". In addition, originating ANI[9] is also used to identify payphones by including them in the records to be forwarded for compensation to the billing compensation clearinghouse.
- Dollar Phone' criteria for identifying compensable payphone calls include all calls with info-digits 27, 29 or 70, and call duration parameters as noted in the supplemental information[10] (SQL section and customer service record layouts). Dollar Phone has no alternative compensation agreements (ACA) in place so no calls are excluded from the Compensable Call File.
- Dollar Phone's criteria for identifying incomplete or otherwise non-compensable calls include:
  - 1) calls that do not have info-digits 27, 29 or 70 (not from a payphone-identified originating ANI),
  - 2) calls which last less than, or are equal to, 60 seconds
- Dollar Phone's criteria used to determine the identities of the PSPs to which Dollar Phone owes compensation is established by Dollar Phone's clearinghouse for settlements.
- The type of information that Dollar Phone needs from the PSPs in order to compensate the PSPs is determined by Dollar Phone's clearinghouse settlements.

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[9] ANI (Automatic Number Identification) is a system utilized by telephone companies to identify the DN (Directory Number) of a calling subscriber.

ANI serves a function similar to Caller-ID, but utilizes different underlying technology. In addition, although Caller-ID can be blocked by prefixing a call with *67, ANI is (usually) impossible to block.

ANI was originally developed for telephone company billing purposes. ANI technology is also now offered to commercial customers who may benefit from knowing who is calling them. In addition, ANI is one of the core technologies behind the 911 emergency service.

ANI data is usually transmitted in-band using multi-frequency (MF) signaling. However, ANI data can also be transmitted separately if you have an ISDN PRI.

[10] "Adjunct to Management Report on Compliance with Applicable Requirements of the FCC's Rules and Regulations"

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APPENDIX A

GAGAS

1. **Relationship between GAGAS and AICPA and other standards**

(excerpt)

1.09 GAGAS may be used in conjunction with professional standards issued by other authoritative bodies. For example, the American Institute of Certified Public Accountants (AICPA) has issued professional standards that apply in financial audits and attestation engagements performed by certified public accountants (CPA). GAGAS incorporate the AICPA's field work and reporting standards and the related statements on auditing standards for financial audits unless specifically excluded, as discussed in chapters 4 and 5. GAGAS incorporate the AICPA's general standard on criteria, and the field work and reporting standards and the related statements on the standards for attestation engagements, unless specifically excluded, as discussed in chapter 6. To meet the needs of users of government audits and attestation engagements, GAGAS also prescribe requirements in addition to those provided by the AICPA for these types of work.

1.08 Auditors may provide professional services, other than audits and attestation engagements, that consist solely of gathering, providing, and explaining information requested by decision makers or by providing advice or assistance to officials of the audited entity. GAGAS are not applicable to non-audit services, which are described more fully in chapter 2. However, providing non-audit services may affect an audit organization's independence to conduct audits, which is discussed in chapter 3

1.07 Even if not required to do so, auditors may find it useful to follow GAGAS in performing audits of federal, state, and local government programs as well as in performing audits of government awards administered by contractors, nonprofit entities, and other non-government entities. Many audit organizations not formally required to do so, both in the United States of America and in other countries, voluntarily follow GAGAS

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APPENDIX B

References & Definitions as Required by this Report

(*) except as noted in the details (Supplemental Information) section. In some cases, there may appear to be minor deviations to the regulations. For example, the rules imply the completing carrier have several persons doing specific jobs: A switch engineer (contact), and an IT manager (contact). In some carriers, this is the same person. Where this completing carrier exhibits these small discrepancies, they are so noted in the Supplemental Information section. They do not affect the integrity of the audit or the validity of the data.

Dial Around Compensable Rate:

The amount paid to the payphone operator by the completing carrier for a completed DAC call. The rate is currently included in the Dollar Phone, accounting procedures. Changes will be made when required by the FCC.

Compensable Call:

A compensable call is a completed payphone-originated call.

Completed Call:

A call is considered completed when it has been answered.. But the definition is considerably more complicated than it would appear.. Calls from many of Dollar Phone' customers are to destinations worldwide, in many cases where reliable call completion (answer supervision) may not always be available, reliable, or, is "simulated" by the foreign ILEC due to antiquated CPE equipment.. In the absence of positive answer supervision, or in addition to it, it appears completing carriers use a 60-second time period, which begins at the time the customer presses the last digit of the called telephone number, and includes all the switching times on the outbound leg plus on-hook ringing times at the receiver's end, and makes allowances for the lack of answer supervision signaling. In some cases the call actually never completes and the caller is left hanging with dead space in his ear. In this case, Dollar Phone does not charge the caller, but, because the call exceeds 60 seconds, does consider the call compensable and includes the call in its compensable call record file.

This process varies widely by completing carrier. The details of the Dollar Phone process are included in the Supplemental Information materials.

Clearinghouse

Third party entity that performs some of the functions required to compensate payphone owners

UTC:

Universal Coordinated Time (formerly known as Greenwich Mean Time)

Supplemental Information Section

As an adjunct to this audit, a significant amount of material is attached, including graphics and diagram plates, explaining each step in the data flow process. References in this portion of the audit to "details" are to this material. There are some references above to "exceptions". This is due to the wording of the FCC rulings where there might be some margin for interpretation. In some of the "exception" notations, the reasons are that the completing carrier uses a third party DAC provider like Billing Concepts, Inc. This means that, although responsibility still lies with the completing carrier, the PSP usually starts with BCI for compensation issues. If BCI cannot resolve the issues on behalf of the completing carrier, then the officer in charge at the completing carrier is brought into the loop. In many cases, BCI is able to handle the inquiry and the completing carrier is never even aware of the issue.

Similarly, the third party compensation service produces reports which aren't available to the completing carrier. The

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third party compensation service also has access to PSP ANI's which are not available to the completing carrier.

These constitute "exceptions" to a possible strict interpretation of the rules and are so noted above, although they are not in any way implying a "failure to comply" by the completing carrier.

The Supplemental Information is available to the inquiring PSP at the completing carrier's offices.

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APPENDIX C

Federal Communications Commission FCC 03-235

64.1310 Payphone compensation procedures.

64.1310 Payphone compensation procedures.

(a) Unless the payphone service provider agrees to other compensation arrangements, each Completing Carrier identified in section 64.1300(a) shall compensate the payphone service provider as follows:

(1) Each Completing Carrier shall establish a call tracking system that accurately tracks coinless access code or subscriber toll-free payphone calls to completion..
(2) Each Completing Carrier shall pay compensation to payphone service providers on a quarterly basis for each completed payphone call identified in the Completing Carrier's quarterly report required by section 64.1310(a)(4).
(3) At the conclusion of each quarter, the chief financial officer of the Completing Carrier shall submit to each payphone service provider to which compensation is tendered a sworn statement that the payment amount for that quarter is accurate and is based on 100% of all completed calls that originated from that payphone service provider's payphones.
(4) At the conclusion of each quarter, the Completing Carrier shall submit to the payphone service provider, in computer readable format, a report on that quarter that includes:

(A) A list of the toll-free and access numbers dialed from each of that payphone service provider's payphones and the ANI for each payphone;
(B) The volume of calls for each number identified in subparagraph (a)(4)(A) that were completed by the Completing Carrier; and
(C) The name, address, and phone number of the person or persons responsible for handling the Completing Carrier's payphone compensation.
(D) The carrier identification code ("CIC") of all facilities-based long distance carriers that routed calls to the Completing Carrier, categorized according to the subparagraph (a)(4)(A) list of toll-free and access code numbers.

(b) For purposes of this subpart, an Intermediate Carrier is a facilities-based long distance carrier that switches payphone calls to other facilities-based long distance carriers.
(c) Unless the payphone service provider agrees to other reporting arrangements, each Intermediate Carrier shall provide the payphone service provider with quarterly reports, in computer readable format, that include:

(1) A list of all the facilities-based long distance carriers to which the Intermediate Carrier switched toll-free and access code calls;
(2) For each facilities-based long distance carrier identified in paragraph (b)(1), a list of the toll-free and access code numbers that all local exchange carriers have delivered to the Intermediate Carrier and that the Intermediate Carrier switched to the identified facilities-based long distance carrier;
(3) The volume of calls for each number identified in paragraph (b)(2) that the Intermediate Carrier has received from each of that payphone service provider's payphones, identified by their ANIs, and switched to each facilities-based long distance carrier identified in paragraph (b)(1); and
(4) The name, address and telephone number and other identifying information of the person or persons for each facilities-based long distance carrier identified in paragraph (b)(1) who serves as the Intermediate Carrier's contact at each identified facilities-based long distance carrier.

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APPENDIX D

FCC Federal Communications Commission FCC 03-235

FINAL RULES

§ 64.1310 Payphone compensation procedures.

Note: Section 64.1300 is amended by revising paragraph (a), adding a new paragraph (b), and redesignating prior paragraphs (b) and (c) as (c) and (d) to read as follows:

(a) Unless the payphone service provider agrees to other compensation arrangements, each Completing Carrier identified in section 64.1300(a) shall compensate the payphone service provider as follows:

(1) Each Completing Carrier shall establish a call tracking system that accurately tracks coinless access code or subscriber toll-free payphone calls to completion.

(2) Each Completing Carrier shall pay compensation to payphone service providers on a quarterly basis for each completed payphone call identified in the Completing Carrier's quarterly report required by section 64.1310(a)(4).

(3) At the conclusion of each quarter, the chief financial officer of the Completing Carrier shall submit to each payphone service provider to which compensation is tendered a sworn statement that the payment amount for that quarter is accurate and is Based on 100% of all completed calls that originated from that payphone service provider's payphones.

(4) At the conclusion of each quarter, the Completing Carrier shall submit to the payphone service provider, in computer readable format, a report on that quarter that includes:

(A) A list of the toll-free and access numbers dialed from each of that payphone service provider's payphones and the ANI for each payphone;

(B) The volume of calls for each number identified in subparagraph (a)(4)(A) that were completed by the Completing Carrier; and

(C) The name, address, and phone number of the person or persons responsible for handling the Completing Carrier's payphone compensation.

(D) The carrier identification code ("CIC") of all facilities-based long distance carriers that routed calls to the Completing Carrier, categorized according to the subparagraph (a)(4)(A) list of toll-free and access code numbers.

(b) For purposes of this subpart, an Intermediate Carrier is a facilities-based long distance carrier that switches payphone calls to other facilities-based long distance carriers.

(c) Unless the payphone service provider agrees to other reporting arrangements, each Intermediate Carrier shall provide the payphone service provider with quarterly reports, in computer readable format, that include:

(1) A list of all the facilities-based long distance carriers to which the Intermediate Carrier switched toll-free and access code calls;

(2) For each facilities-based long distance carrier identified in paragraph (b)(1), a list of the toll-free and access code numbers that all local exchange carriers have delivered to the Intermediate Carrier and that the Intermediate Carrier switched to the identified facilities-based long distance carrier;

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(3) The volume of calls for each number identified in paragraph (b)(2) that the Intermediate Carrier has received from each of that payphone service provider's payphones, identified by their ANIs, and switched to each facilities-based long distance carrier identified in paragraph (b)(1); and

(4) The name, address and telephone number and other identifying information of the person or persons for each facilities-based long distance carrier identified in paragraph (b)(1) who serves as the Intermediate Carrier's contact at each identified facilities-based long distance carrier.

(g) Each Completing Carrier and each Intermediate Carrier must maintain verification data to support their subparagraph (a)(4) and subparagraph (c) quarterly reports for 18 months after the close of that quarter. This data must include the time and date that each call identified in subparagraph (a)(4) and subparagraph (c) was made. This data must be provided to the payphone service provider upon request.

Note: Section 64.1320 is amended by revising the Title, paragraphs (a) and (b), and by adding paragraphs (c), (d), (e), (f), and (g) to read as follows:

§ 64.1320 Payphone Call Tracking System Audits.

(a) As a precondition to tendering payment pursuant to section 64.1310(a), all Completing Carriers must undergo a system audit of their section 64.1310(a)(1) tracking system by an independent third party auditor whose responsibility shall be, using audit methods approved by the American Institute for Certified Public Accountants, to determine whether the call tracking system accurately tracks payphone calls to completion.

(b) By the effective date of these rules, each Completing Carrier in paragraph (a) must file an audit report from the auditor (the "System Audit Report") regarding the Completing Carrier's compliance with section 64.1310(a)(1) as of the date of the audit with the Commission's Secretary in CC Docket No. 96-128 and with each payphone service provider for which it completes calls and with each facilities-based long distance carrier from which it receives payphone calls.

(c) The Completing Carrier must comply with, and the third-party auditor must verify, the Completing Carrier's compliance with the following factors in establishing a call tracking system pursuant to section 64.1310(a)(1):

(1) Whether the Completing Carrier's procedures accurately track calls to completion;

(2) Whether the Completing Carrier has a person or persons responsible for tracking, compensating, and resolving disputes concerning payphone completed calls;

(3) Whether the Completing Carrier has effective data monitoring procedures;

(4) Whether the Completing Carrier adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability;

(5) Whether the Completing Carrier has created a compensable payphone call file by matching call detail records against payphone identifiers;

(6) Whether the Completing Carrier has procedures to incorporate call data into required reports;

(7) Whether the Completing Carrier has implemented procedures and controls needed to resolve payphone compensation disputes;

(8) Whether the independent third-party auditor can test all critical controls and procedures to verify that errors are insubstantial; and

(9) Whether the Completing Carriers has in place adequate and effective business rules for implementing and paying payphone compensation, including rules used to:

(i) identify calls originated from payphones;

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(ii) identify compensable payphone calls;

(iii) identify incomplete or otherwise noncompensable calls; and

(iv) determine the identities of the payphone service providers to which the Completing Carrier owes compensation.

(d) Consistent with standards established by the American Institute of Certified Public Accounts for attestation engagements, the System Audit Report shall consist of:

(1) the Completing Carrier's representation concerning its compliance; and

(2) the independent auditor's opinion concerning the Completing Carrier's representation of compliance. The Completing Carrier's representation must disclose

(i) its criteria for identifying calls originating from payphones;

(ii) its criteria for identifying compensable payphone calls;

(iii) its criteria for identifying incomplete or otherwise noncompensable calls;

(iv) its criteria used to determine the identities of the payphone service providers to which the completing carrier owes compensation;

(v) the identity of any clearinghouses the Completing Carrier uses; and (vi) the types of information that the Completing Carrier needs from the payphone service providers in order to compensate them.

(e) At the time of the filing of System Audit Report with the Commission, the Completing Carrier shall file with the Commission's Secretary, and the facilities-based long distance carriers and payphone service providers identified in section 64.1320(b), a statement that includes the name of the Completing Carrier, and the name, address and phone number for the person or persons responsible for handling the Completing Carrier's payphone compensation and for resolving disputes with payphone service providers over compensation, and this statement shall be updated within 60 days of any changes of such persons.

(f) One year after the filing of the System Audit Report, and annually thereafter, the Completing Carrier shall engage an independent third-party auditor to:

(1) verify that no material changes have occurred concerning the Completing Carrier's compliance with the criteria of the prior year's System Audit Report; or

(2) if a material change has occurred concerning the Completing Carrier's compliance with the prior year's System Audit Report, verify that the material changes do not affect compliance with the audit criteria set forth in subparagraph (c). The Completing Carrier must fully disclose any material changes concerning its call tracking system in its representation to the auditor. The Completing Carrier shall file and provide copies of all System Audit Reports pursuant to the procedures set forth in subparagraph (b).

(g) Subject to protections safeguarding the auditor's and the Completing Carrier's confidential and proprietary information, the Completing Carrier shall provide, upon request, to the payphone service provider for inspection any documents, including working papers, underlying the System

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APPENDIX E

Payphone Compensation Criteria – Info Digit Parameter Definitions

NANP North American Numbering Plan

00
Plain Old Telephone Service (POTS) - non-coin service requiring no special treatment
01
Multiparty line (more than 2) - ANI cannot be provided on 4 or 8 party lines. The presence of this "01" code will cause an Operator Number Identification (ONI) function to be performed at the distant location. The ONI feature routes the call to a CAMA operator or to an Operator Services System (OSS) for determination of the calling number.
02
ANI Failure - the originating switching system indicates (by the "02" code), to the receiving office that the calling station has not been identified. If the receiving switching system routes the call to a CAMA or Operator Services System, the calling number may be verbally obtained and manually recorded. If manual operator identification is not available, the receiving switching system (e.g., an interLATA carrier without operator capabilities) may reject the call.
03-05
Unassigned
06
Station Level Rating - The "06" digit pair is used when the customer has subscribed to a class of service in order to be provided with real time billing information. For example, hotel/motels, served by PBXs, receive detailed billing information, including the calling party's room number. When the originating switching system does not receive the detailed billing information, e.g., room number, this "06" code allows the call to be routed to an operator or operator services system to obtain complete billing information. The rating and/or billing information is then provided to the service subscriber. This code is used only when the directory number (DN) is not accompanied by an automatic room/account identification.
07
Special Operator Handling Required - calls generated from stations that require further operator or Operator Services System screening are accompanied by the "07" code. The code is used to route the call to an operator or Operator Services System for further screening and to determine if the station has a denied-originating class of service or special routing/billing procedures. If the call is unauthorized, the calling party will be routed to a standard intercept message.
08-09
Unassigned
10
Not assignable - conflict with 10X test code
11
Unassigned
12-19
Not assignable - conflict with international outpulsing code
20
Automatic Identified Outward Dialing (AIOD) - without AIOD, the billing number for a PBX is the same as the PBX Directory Number (DN). With the AIOD feature, the originating line number within the PBX is provided for charging purposes. If the AIOD number is available when ANI is transmitted, code "00" is sent. If not, the PBX DN is sent with ANI code "20". In either case, the AIOD number is included in the AMA record.
21-22
Unassigned
23
Coin or Non-Coin - on calls using database access, e.g., 800, ANI II 23 is used to indicate that the coin/non-coin status of the originating line cannot be positively distinguished for ANI purposes by the SSP. The ANI II pair 23 is substituted for the II pairs which would otherwise indicate that the non-coin status is known, i.e., 00, or when there is ANI failure.

ANI II 23 may be substituted for a valid 2-digit ANI pair on 0-800 calls. In all other cases, ANI II 23 should not be substituted for a valid 2-digit ANI II pair which is forward to an SSP from an EAEO.

Some of the situations in which the ANI II 23 may be sent:

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.Calls from non-conforming end offices (CAMA or LAMA types) with combined coin/non-coin trunk groups.

0.0-800 Calls

0.Type 1 Cellular Calls

0.Calls from PBX Trunks

0.Calls from Centrex Tie Lines

24
Code 24 identifies a toll free service call that has been translated to a Plain Old Telephone Service (POTS) routable number via the toll free database that originated for any non-pay station. If the received toll free number is not converted to a POTS number, the database returns the received ANI code along with the received toll free number. Thus, Code 24 indicates that this is a toll free service call since that fact can no longer be recognized simply by examining the called address.
25
Code 25 identifies a toll free service call that has been translated to a Plain Old Telephone Service (POTS) routable number via the toll free database that originated from any pay station, including inmate telephone service. Specifically, ANI II digits 27, 29, and 70 will be replaced with Code 25 under the above stated condition.
26
Unassigned
27
Code 27 identifies a line connected to a pay station which uses network provided coin control signaling. II 27 is used to identify this type of pay station line irrespective of whether the pay station is provided by a LEC or a non-LEC. II 27 is transmitted from the originating end office on all calls made from these lines.
28
Unassigned
29
Prison/Inmate Service - the ANI II digit pair 29 is used to designate lines within a confinement/detention facility that are intended for inmate/detainee use and require outward call screening and restriction (e.g., 0+ collect only service). A confinement/detention facility may be defined as including, but not limited to, Federal, State and/or Local prisons, juvenile facilities, immigration and naturalization confinement/detention facilities, etc., which are under the administration of Federal, State, City, County, or other Governmental agencies. Prison/Inmate Service lines will be identified by the customer requesting such call screening and restriction. In those cases where private paystations are located in confinement/detention facilities, and the same call restrictions applicable to Prison/Inmate Service required, the ANI II digit for Prison/Inmate Service will apply if the line is identified for Prison/Inmate Service by the customer.
30-32
Intercept - where the capability is provide to route intercept calls (either directly or after an announcement recycle) to an access tandem with an associated Telco Operator Services System, the following ANI codes should be used:

0.30 Intercept (blank) - for calls to unassigned directory number (DN)

0.31 Intercept (trouble) - for calls to directory numbers (DN) that have been manually placed in trouble-busy state by Telco personnel

0.32 Intercept (regular) - for calls to recently changed or disconnected numbers

33
Unassigned
34
Telco Operator Handled Call - after the Telco Operator Services System has handled a call for an IC, it may change

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the standard ANI digits to "34", before outpulsing the sequence to the IC, when the Telco performs all call handling functions, e.g., billing. The code tells the IC that the BOC has performed billing on the call and the IC only has to complete the call.
35-39
Unassigned
40-49
Unrestricted Use - locally determined by carrier
50-51
Unassigned
52
Outward Wide Area Telecommunications Service (OUTWATS) - this service allows customers to make calls to a certain zone(s) or band(s) on a direct dialed basis for a flat monthly charge or for a charge based on accumulated usage. OUTWATS lines can dial station-to-station calls directly to points within the selected band(s) or zone(s). The LEC performs a screening function to determine the correct charging and routing for OUTWATS calls based on the customer's class of service and the service area of the call party. When these calls are routed to the interexchange carrier via a combined WATS-POTS trunk group, it is necessary to identify the WATS calls with the ANI code "52".
53-59
Unassigned
60
TRS - ANI II digit pair 60 indicates that the associated call is a TRS call delivered to a transport carrier from a TRS Provider and that the call originated from an unrestricted line (i.e., a line for which there are no billing restrictions). Accordingly, if no request for alternate billing is made, the call will be billed to the calling line.
61
Cellular/Wireless PCS (Type 1) - The "61" digit pair is to be forwarded to the interexchange carrier by the local exchange carrier for traffic originating from a cellular/wireless PCS carrier over type 1 trunks. (Note: ANI information accompanying digit pair "61" identifies only the originating cellular/wireless PCS system, not the mobile directory placing the call.
62
Cellular/Wireless PCS (Type 2) - The "62" digit pair is to be forwarded to the interexchange carrier by the cellular/wireless PCS carrier when routing traffic over type 2 trunks through the local exchange carrier access tandem for delivery to the interexchange carrier. (Note: ANI information accompanying digit pair "62" identifies the mobile directory number placing the call but does not necessarily identify the true call point of origin.)
63
Cellular/Wireless PCS (Roaming) - The "63" digit pair is to be forwarded to the interexchange carrier by the cellular/wireless PCS subscriber "roaming" in another cellular/wireless PCS network, over type 2 trunks through the local exchange carrier access tandem for delivery to the interexchange carrier. (Note: Use of "63" signifies that the "called number" is used only for network routing and should not be disclosed to the cellular/wireless PCS subscriber. Also, ANI information accompanying digit pair "63" identifies the mobile directory number forwarding the call but does not necessarily identify the true forwarded-call point of origin.)
64-65
Unassigned
66
TRS - ANI II digit pair 66 indicates that the associated call is a TRS call delivered to a transport carrier from a TRS Provider, and that the call originates from a hotel/motel. The transport carrier can use this indication, along with other information (e.g., whether the call was dialed 1+ or 0+) to determine the appropriate billing arrangement (i.e., bill to room or alternate bill).
67
TRS - ANI II digit pair 67 indicates that the associated call is a TRS call delivered to a transport carrier from a TRS Provider and that the call originated from a restricted line. Accordingly, sent paid calls should not be allowed and additional screening, if available, should be performed to determine the specific restrictions and type of alternate billing permitted.
68-69
Unassigned
70
Code 70 identifies a line connected to a pay station (including both coin and coinless stations) which does not use network provided coin control signaling. II 70 is used to identify this type pay station line irrespective of whether the pay station is provided by a LEC or a non-LEC. II 70 is transmitted from the originating end office on all calls made from these lines.
71-79
Unassigned
80-89

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Reserved for Future Expansion "to" 3-digit Code
90-92
Unassigned
93
Access for private virtual network types of service: the ANI code "93" indicates, to the IC, that the originating call is a private virtual network type of service call.
94
Unassigned
95
Unassigned - conflict with Test Codes 958 and 959
96-99
Unassigned

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