

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges ("Cramming"))	CG Docket No. 11-116
)	
Consumer Information and Disclosure)	CG Docket No. 09-158
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170

**SEPARATION OF TELECOMMUNICATIONS VERSUS NON-
TELECOMMUNICATIONS CHARGES WITH RESPECT TO
NON-CARRIER THIRD-PARTY CHARGES**

Requested Relief

CenturyLink respectfully seeks a limited extension of time to implement one portion of the Commission's *2012 Cramming Order*.¹ Specifically, CenturyLink requests additional time to separate non-carrier third-party charges into telecommunications and non-telecommunications components, with separate totals being presented on carriers' bills.²

Due to the number of CenturyLink systems, and associated multiple bill formats, the separation of non-carrier third-party charges into the required different components requires a major IT release, with attendant system testing, to accomplish both the separation and ensure ongoing billing continues reliably. Because of the critical importance of a carrier's bill format and its accuracy, most carriers (CenturyLink included) undertake major IT releases only a few

¹ *In the Matter of Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges ("Cramming"); Consumer Information and Disclosure; Truth-in-Billing and Billing Format, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 4436 (2012); and Erratum after publication, DA 12-1804 (rel. Nov. 8, 2012) (2012 Cramming Order or Order).*

² 47 C.F.R. § 64.2401(a)(3) (Appendix A, *Order*, 27 FCC Rcd at 4493).

times a year. Because of the timing of the Commission's *Order*, CenturyLink was unable to complete the separation of non-carrier third-party charges for telecommunications and non-telecommunications services in its end-of-year 2012 IT releases.

CenturyLink's next major IT release is set for April 2013. Accordingly, CenturyLink requests a limited extension of time until May 30, 2013 to allow it to complete the separation of non-carrier third-party charges into telecommunications and non-telecommunications categories and to provide such information on the Summary Bill pages of its multiple bill formats.

CenturyLink is not proposing to delay the necessary bill changes until May 30, 2013 if the task can be completed before then. It plans to implement the separation-of-charges functionality as soon as its next IT release and testing is completed. CenturyLink expects such work to be completed as soon as late April 2013 and no later than May 30, 2013. Below, CenturyLink demonstrates good cause for granting the request.

Importantly, CenturyLink's request is very limited in scope. While the extension involves some months, the number of customers that currently encounter non-carrier third-party charges is very small, involving less than 350,000 bills (out of multiple millions of bills) and less than 2.5% of CenturyLink's customer base. And many of those non-carrier third-party billings are for telecommunications services, such as those offered by interexchange carriers and operator services providers.

Moreover, as the Commission is aware, beginning September, 2012, CenturyLink further reduced its already limited non-carrier third-party charging for enhanced services. Going forward, the types of charges that the Commission outlined in its *2012 Cramming Order* as being

of the most concern will be even less a part of CenturyLink's billing portfolio than previously.³ Finally, the Commission has realized a significant reduction of cramming complaints over the past few years.⁴ All of these facts combine to demonstrate that the public will not be adversely affected by the limited extension of time CenturyLink seeks for this one aspect of the *2012 Cramming Order*.

Legal Standard for Extension of Time

CenturyLink requests the Commission recognize that CenturyLink faces special circumstances warranting a limited-time deviation from the separation-of-charges rule; and, consequently, that there is good cause to grant it a limited extension. The public interest will be advanced by such grant. CenturyLink's customers will benefit by the company taking the additional time necessary to craft a bill that not only meets the requirements of the separation-of-charges rule in the bill's presentation (*i.e.*, that charges get separated when appropriate) but in its underlying operation (*i.e.*, that totals from the non-carrier third-party bill section accurately get pulled forward to the Summary Page of the bill and are totaled correctly).⁵ It is critical that IT changes made to implement this one aspect of the *2012 Cramming Order* not be allowed inadvertently to introduce errors affecting a potentially much larger group of consumers. In this

³ Currently, the primary third-party non-telecommunications charges that may appear on customers' bills will be for Internet access.

⁴ As CenturyLink demonstrated in its filed comments, cramming complaints filed with the Commission have decreased significantly during the past five years. Comments of CenturyLink to Further Notice of Proposed Rulemaking, filed herein June 25, 2012, at 3-4 and Appendices A and B. Indeed, in the most recent quarterly report cramming did not even appear. *See* Quarterly Report of Consumer Inquiries and Informal Complaints for Third Quarter of Calendar Year 2012 (rel. Oct. 25, 2012).

⁵ 47 C.F.R. § 1.3 (the Commission appropriately can waive its regulations when good cause is demonstrated by showing special circumstances warranting deviation from a general rule and that a waiver would serve the public interest). *And see Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990), citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *aff'd*, 459 F.2d 1203, *cert denied*, 409 U.S. 1027 (1972).

regard, “a more effective implementation of overall policy” will attend granting the limited requested extension.⁶

Support for Extension of Time

As noted above, CenturyLink has to implement the separation-of-charges aspects of the Commission’s revised rules through a major IT release, which is scheduled for April, 2013. That IT release must accommodate the fact that CenturyLink has more than four legacy billing systems throughout its operations. Each of those systems has about five bill presentations that are impacted by the rule revision. Also impacted are a variety of computer systems screens associated with electronic bills where bill totals or communications about bill totals are presented.

The task begins with the identification of which charges associated with non-carrier third-parties are telecommunications charges and which are not. Moreover, in the section of the CenturyLink bills dealing with non-carrier third-party charges, there might be more than one third-party (*i.e.*, billing aggregator or vendor) included. Each of those entities may have telecommunications and non-telecommunications charges. The telecommunications charges of each of those separate entities needs to be added to the telecommunications charges of other billing entities to present a total “telecommunications charges” figure on the Summary Page of the bill. A similar program needs to be created for non-telecommunications charges. This process requires extensive programming work.

It is critical that CenturyLink ensure not only that the bill presentation associated with the separation of charges between telecommunications and non-telecommunications charges is clear and accurate but that the mathematical operations are designed and developed to correctly

⁶ See *WAIT Radio*, 418 F.2d at 1159.

capture the telecommunications and non-telecommunications sums. This latter requirement drives the need for major testing of the program before it goes “live” to ensure that it works correctly and reliably. It is the need for this critical testing element that caused CenturyLink’s implementation of the separation-of-charges aspect of the revised rule to be delayed.

As outlined in the attached Declaration by Ms. Loretta A. Huff, Director, Regulatory Compliance, CenturyLink was diligent in its pursuit of compliance with the Commission’s rules as they were amended by the *2012 Cramming Order*. Work to implement the *Order* began even before the Commission first published it in the Federal Register. Through cross-disciplinary teams, CenturyLink worked to identify those tasks required to comply with the *Order* and to establish a timeline for their implementation. These teams moved forward even though the final requirements, and their timing, could not be fully known until after the Office of Management and Budget (OMB) completed its review under the Paperwork Reduction Act.

Unfortunately, the timing of the publication of the Commission’s *Order* -- May 2012 -- fell after the time when the requirements for CenturyLink’s IT releases for November and December 2012 had been determined. The internal business and financial requirements for those releases had been set in February of 2012. Still, CenturyLink’s IT organization worked diligently with CenturyLink’s legal, public policy and compliance personnel to add requirements to those end-of-year IT releases. As a result of that goodwill and diligence, CenturyLink was able to incorporate necessary bill-block disclosure requirements into those releases.⁷

CenturyLink’s success in implementing the revised cramming rules requiring that it clearly and conspicuously notify subscribers of its bill-blocking options at the point of sale, on each

⁷ The bill-block disclosures can be characterized as “on the bill” and “off the bill.” Those disclosures that were “off the bill” were accomplished outside the framework of a major IT release. Only the “on the bill” disclosures were incorporated into the end-of-year releases.

telephone bill, and on each carrier's website cannot be minimized, since that aspect of the Commission's new rules impacts 100% of CenturyLink's customer base, unlike the separation-of-charges impact which affects only a very few customers.

While the changes associated with the bill-block disclosure, like the separations-of-charges changes, involved changes to multiple billing systems and bill formats, adding the necessary text to consumer bills was less complex and far less fraught with the possibilities of billing errors than the separation-of-charges requirement.⁸ The latter involved introducing wholly new arithmetic calculations not previously done in CenturyLink's billing systems.

Granting CenturyLink a limited extension will ensure not only that the non-carrier third-party charges are accurately separated, but that they "move" properly through one system to another so that customers are correctly charged. No one wants errors in customers' billings -- not CenturyLink and not its customers. Billing errors must be avoided so that customers have continued confidence in the fairness and accuracy of their invoices.

The system testing associated with a major IT release is a critical safeguard against errors that might lead to incorrect billings and in assuring that CenturyLink can continue to provide its customers with the superior service it strives to deliver. Granting CenturyLink's request to accommodate that testing better protects CenturyLink's customers than if it had sought to jury-

⁸ Implementing the bill-block disclosure by the revised rule's effective date was itself a formidable task. Adding text to various CenturyLink communication channels, given the number and variety of channels potentially affected, was also challenging. Those channels include not only traditional call-center context, but also CenturyLink's various websites, points of sale and its various bills. Script changes were made for the company's various sales channels, ranging from the more traditional ones involving service representatives answering phones to online sales portals, click-to-chat portals, and retail kiosks. In turn, those changes needed to be incorporated into internal processes and systems, including interactive voice response (IVR) units and written-text scripting as might occur in a click-to-chat session. Employee communication, education and training about the need to make bill-block disclosures were also important aspects in the implementation of the Commission's bill-block disclosure requirement.

rig some kind of temporary “bill fix” to meet a December invoice effective date. Pursuing that approach (assuming it could even have been done) would have consumed limited, valuable resources and yet -- undoubtedly -- would still have resulted in significant reconstruction or correction after-the-fact. CenturyLink would have needed to continue to pursue a more stable, reliable solution through some future IT release.

Conclusion

Accordingly, CenturyLink asks the Commission to grant it a limited extension of time until May 30, 2013 to implement its charge-separation requirements associated with its *2012 Cramming Order*. The public interest will be served by such a grant, as CenturyLink and customers alike will be able to rely on billing-systems processes that have been properly tested for reliability.

Respectfully submitted,

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Its Attorney

November 21, 2012

Before the
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**DECLARATION OF LORETTA A. HUFF,
DIRECTOR, REGULATORY COMPLIANCE**

I, Loretta A. Huff, offer this Declaration in support of CenturyLink's request for an extension of time or limited waiver, filed contemporaneously. I believe CenturyLink demonstrates good cause for its request and that granting the request would be in the public interest.

1. My name is Loretta A. Huff and I have been employed by CenturyLink as Director, Regulatory Compliance since 2003. My current responsibilities include ensuring that CenturyLink complies with state and federal regulatory and statutory obligations associated with telecommunications and video operations. I have been employed by CenturyLink and its predecessor companies, Qwest, U S WEST and Mountain Bell for over 29 years. I have held a number of management positions in various departments including Information Systems, Network, Federal Services, Wholesale, Risk Management, Legal and Public Policy.

Request for an Extension of Time

2. In my position as Director, Regulatory Compliance, I oversaw CenturyLink's significant work efforts to implement the FCC's *2012 Cramming Order* (or *Order*).

CenturyLink's diligent work efforts began even before the *Order* was published in the Federal Register on May 24, 2012. Those efforts, provided in greater detail below, have allowed CenturyLink to meet the effective dates of the Commission's revised bill-block disclosure requirements -- requirements that touch CenturyLink's entire customer base -- at CenturyLink's points of sale, at its websites, and on its bills.

3. While CenturyLink was able to incorporate the billing system changes for the bill-block disclosure requirement in major Information Technologies (IT) releases in November/December 2012, the additional complexity associated with the new rule regarding the separation of non-carrier third-party charges into telecommunications and non-telecommunications components renders us unable to meet the current December 26, 2012 effective date of that rule. With respect to that singular rule requirement, CenturyLink requests a limited extension of time to comply until May 30, 2013, after its next major IT release scheduled for late April 2013. That release is currently planned to incorporate the physical bill presentation changes (showing telecommunications as well as non-telecommunications charges), as well as the necessary calculations such that sub-totals will true up to totals and the non-carrier third-party totals will appear correctly (and sum correctly) on the Summary pages of our bills.

CenturyLink's Due Diligence in Implementing the 2012 Cramming Order

4. In the Commission's *Order*, it made modifications to 47 C.F.R. §§ 64.2401 (a)(3) and (f). To comply with those rule amendments, CenturyLink was required to make system and process changes to:

- a) Notify its customers at the point of sale, on each telephone bill, and on each of its websites about customers' options to block non-carrier third party charges. (This set of requirements is generally referred to below as the "bill-block disclosure requirements.") The effective rule date for the bill-block notification with respect to points of sale and websites was November 13, 2012; with respect to bills themselves, the effective date is December 26, 2012.
- b) Place non-carrier third-party charges in a separate section of the bill, as well as provide separate totals for billing aggregators' carrier/telecom and non-carrier/non-telecom charges. These subtotals are to be displayed on the summary payment page of a paper bill or an equivalent location on an electronic bill. (This set of requirements is generally referred to below as the "separation-of-charges requirement.")

5. CenturyLink began our due diligence to implement the requirements of the *2012 Cramming Order* even before that *Order* was published in the Federal Register on May 24, 2012. In early May, we began assessing the scope of the IT impacts with our policy, compliance and legal organizations. On May 15, 2012, a change request (CR) to alert our Information Technologies department about required changes to CenturyLink's various billing systems and bill formats was issued. A call with affected business constituents was held by Public Policy and Regulatory Compliance on May 18, 2012, to identify those persons who should assume responsibility for information gathering in anticipation of future implementation meetings and activities. A formal request to create a cross-functional team was issued on May 23, 2012. Clearly, CenturyLink appreciated the significance and importance of the Commission's cramming objectives, as well as the difficulties it would face in implementing the new rules, and dedicated substantial time and resources to their implementation.

6. The bill-block disclosure requirements and the separation-of-charges requirement were preliminarily defined between the issuance of the CR in May and the completion of the high-level requirements on July 17, 2012. This effort included examining multiple residential and business bill formats in the various CenturyLink billing-system environments. In addition, a review was done of online access points where bill-block disclosure messages would be required, as well

as an analysis of the online “My Account” capability that allows customers to view their account information online, including their bills. Discussions were held with the e-commerce team to identify any customer communications that would be impacted by these requirements, such as e-bills or other customer communications where bill totals might be conveyed. Numerous customer touchpoints were identified, including those identified in Attachment A.

7. Once the general scope of the business impacts was understood, the CenturyLink IT organization analyzed the work effort needed to modify systems to accommodate those impacts. IT identified 23 systems that required modification to address the variety of bill presentations that CenturyLink provides customers. The estimated level of effort to implement the modifications in each of those systems ranged from just under 200 hours of work to over 3,000 hours of work per system. The total project was estimated at 26,801 hours of work or 1,604 person-days. Approximately 90% of that work is associated with the separation-of-charges requirements.

8. The level of effort required to implement the *2012 Cramming Order*, and the fact that the changes were being made to customer bills, led CenturyLink to conclude that at least certain aspects of the bill-block disclosure requirements and all of the separation-of-charges requirement would have to be implemented through major IT releases. A release was scheduled for July of 2012, but there was no possibility to incorporate the necessary requirements in the *2012 Cramming Order*, given the May 2012 order date. The next major release cycle was scheduled for November and December 2012. Business requirements for projects being considered for the November/December 2012 releases were due February 10, 2012, more than two months before the *Order* had been released by the FCC. The system testing for the November/December releases was scheduled to begin the first week of September. The IT organization demonstrated a

willingness to work with constituents to incorporate the narrative bill-block disclosure mandate beyond the September date. However, given all the planning and implementation work, CenturyLink would not be able to deploy the separation-of-charges bill presentation in the 2012 end-of-year releases.

9. Bill-Block Disclosure Requirement. The bill-block disclosure requirements are split into two rules with two implementation dates. The requirement to provide notice at the point-of-sale and on websites was effective November 13, 2012. The requirement impacts a number of communication channels. Necessary script changes were made for use by various CenturyLink sales channels, ranging from the more traditional channels involving service representatives answering phones to online sales portals, click-to-chat portals where sales are transacted, retail kiosks, and sales portals used by business partners as their point of sale, but those changes needed to become incorporated into internal processes and systems (whether those systems be interactive voice response (IVR) units or written-text scripting as might occur in a click-to-chat session). Additionally, the new scripting -- and the reason for the scripting -- needed to be communicated to the several thousand employees in CenturyLink's call centers, as well as its other points of sale. This work was less system-dependent and more focused on process changes. Thus it could be done outside a major systems release and has been successfully implemented.

10. The second piece of the bill-block disclosure requirement is placing the disclosure on customer bills. This requirement has an effective date of December 26, 2012, which CenturyLink will meet. Our IT organization worked hard to accommodate these changes, allowing them to be incorporated into CenturyLink's November/December, 2012 releases. This work was scheduled even before we knew when the OMB approval regarding the *Order*

might occur. (Had the OMB approval occurred in January of 2013 or even December of 2012, for example, CenturyLink would have been positioned to have complied with the bill-block disclosure rule well in advance of a 2013 effective date.)

11. CenturyLink was able to meet both elements of the bill-block disclosure requirements on time. As between the bill-block disclosure requirements and the separations-of-charges requirement, the former is certainly the more ubiquitous, customer-facing disclosure.

12. Separation-of-Charges Requirement. As noted above, CenturyLink recognized upon initial review of the *Order* that the system impacts of that *Order* were significant. Any regulatory mandate that touches a CenturyLink bill is a major matter, given the variety of billing systems and formats it has in its operating territories. CenturyLink's legacy operations use a billing system called Ensemble for residential and retail business customers. The legacy Qwest operations use a billing systems called CRIS to support residential and retail business customers. CRIS is further subdivided into three regional versions of the billing system -- Western, Central and Eastern (all stemming from the original AT&T divestiture and the combination of Pacific Northwest Bell (Western), Mountain Bell (Central) and Northwestern Bell (Eastern) into U S WEST). Bill formats for each region, as well as a common format used across the three regions for some customers, each must be separately updated. With versions that can be viewed online as well, there are more than 20 different bill formats to be considered.

13. Separating non-carrier third-party charges into telecommunications and non-telecommunications, providing separate sub-totals and carrying those totals forward onto the Summary/Payment page of the bill (or the electronic bill equivalent) presented material and significant IT requirements far beyond putting a line or two of extra text (that would explain

CenturyLink's bill-block options, for example) onto the bill page. While the bill-block disclosure requirements touched many points of CenturyLink's systems, the task was relatively straight-forward, involved narrative communication and, once implemented, remained static. On the other hand, the separation requirements necessary to create new sub-categories of charges (*i.e.*, telecommunications and non-telecommunications charges) is many times more complex than fashioning and "printing" a disclosure and is dynamic, since it constantly changes from month to month. The former might be compared to signing a check; the latter to balancing the checkbook.

14. The subtotals associated with the telecommunications and non-telecommunications charges categories were required to be visible not only on a page or two of a customer's paper bill, but also on electronic communications about that bill where bill totals were represented. At each of these access points, there is a possibility of system failure. Such failure would not only create customer confusion and generate many customer questions if not done properly, but it would adversely affect the finances of CenturyLink. Failure in execution was not an option.

15. In addition to identifying and redesigning numerous bill formats, other challenges to implementing the required billing changes surfaced. For example, CenturyLink needed all customer charges submitted by bill aggregators to be identified as either telecommunication or non-telecommunication charges. That identification was not necessarily in place. After working with the aggregators, we are now receiving the information necessary to provide the required separation and corresponding subtotalling of charges.

16. The level of effort required to implement the separation-of-charges aspect of the *2012 Cramming Order* led CenturyLink to conclude that the system changes would (again) have to occur through a major IT release. Such releases include full system testing, which CenturyLink

deems critical to the kind of bill sub-totaling and carry-over application (from the billing aggregator page to the Summary bill page) inherent in the separation-of-charges mandate. This testing will allow us to confirm input layouts from our bill aggregators, to review bill layouts, and to test multiple scenarios to ensure the subtotalling of telecommunications and non-telecommunications charges is working appropriately.

17. To be included in the April 2013 release, all business requirements had to be completed and communicated to the development team by June 15, 2012. This date was just three weeks after the *Order* was published. The cross-functional team worked with the system development team to clarify and document all requirements, even while reminding the team that approval from the OMB was still required and had the potential to change the requirements. The cross-functional team completed this work associated with the separation-of-charges on November 5, 2012, more than four months after the requirements were required for other business projects. The IT team is now focused on completing the required development work in time to make the system test dates. The changes will be implemented in the IT release in late April 2013.

CenturyLink Supports the Commission's Cramming Objectives

18. Even before the Commission issued its *2012 Cramming Order*, CenturyLink had indicated its opposition to cramming and its due diligence around the topic of third party billing. *See generally* Comments of CenturyLink to Notice of Proposed Rulemaking, CG Docket Nos. 11-116, *et al.* (Oct. 24, 2011). The Company had already established significant contractual requirements with respect to the kinds of billings it would accept and the proof required to support the charges. It had already included non-carrier third-party charges in a separate portion of its bill; and it had already provided customers with free blocking options regarding such billings.

19. Additionally, as noted by the Commission in its *2012 Cramming Order*, in April of 2012, CenturyLink advised that it was going to limit the kinds of non-carrier third-party bill transactions it would allow in its bill beginning September 1, 2012. *See 2012 Cramming Order*, 27 FCC Rcd 4436, 4454 at ¶ 44. In line with that announcement, CenturyLink notified its third-party billers that the company would no longer accept billing for certain enhanced services related to third-party billing beginning in September.

20. I do not believe that CenturyLink's customers will be adversely affected by a limited extension of time primarily because the scope of CenturyLink's non-carrier third-party billing has decreased over time. The number of bills including non-carrier third-party billing through a billing aggregator is currently less than 350,000 (out of a total number of bills in the multiple millions) and affects less than 2.5% of CenturyLink's customer base. In addition, the bill-block disclosures customers will receive on every bill by the end of the year provide significant consumer protection with respect to cramming. Finally, as the request for extension of time notes, it is clear that the number of cramming complaints across the industry is decreasing. *See request at page 3 and note 4.*

21. As opposed to the minimum number of customers affected by CenturyLink's request, the benefit to those customers (as well as future customers that incur non-carrier third-party billing) from having a clear representation of telecommunications and non-telecommunications charges on their bill in a manner that is reliable and tested cannot be disputed. Customers do not want to take their precious time to complain about their bills, nor does CenturyLink want to burden its customer-relationship and its limited resources with such interactions. It is best that the charge separation methodology be deemed in sound working order before customers are

exposed to it. For all these reasons, CenturyLink believes its limited request for an extension of time is warranted.

/s/ Loretta A. Huff

November 21, 2012

ATTACHMENT A

Electronic Communications, Websites and Portals Affected By Bill Disclosure Mandate

- a. Legacy-Qwest - Internally Generated email notifications
 - i. Billing - eBill bill ready online Residential
 - ii. Billing - eBill bill ready online Small Bus
 - iii. Billing - eBill ready Autopay - EFT Residential
 - iv. Billing - eBill ready Autopay - CC Residential
 - v. Billing - eBill ready and autopay pending – Residential
 - vi. Billing - eBill ready Autopay - EFT Small Bus
 - vii. Billing - eBill ready Autopay - CC Small Bus
 - xiii. Billing - eBill ready and autopay pending - Small Bus
 - ix. Billing - eBill ready and autopay Unenroll pending – Residential
 - x. Billing - eBill ready and autopay Unenroll pending - Small Bus
 - xi. Payment Reminder - Bill Due Date - PAPERBill RES
 - xii. Payment Reminder - Bill Due Date - PAPERBill BUS
 - xiii. Payment Reminder - Bill Due Date - EBILL RES
 - xiv. Payment Reminder - Bill Due Date - EBILL BUS

- b. Legacy-Qwest - Externally Generated email notifications:
 - i. ACX-Bill Ready - My Account RES
 - ii. ACX-Bill Ready - My Account BUS
 - iii. ACX-Bill Ready - Non My Account

- c. Legacy-CenturyLink
 - i. ACX-Bill Ready