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*Problem Solvers to the Telecommunications Industry*

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ATIS

February 16, 1995

**William F. Caton**  
**Acting Secretary**  
**Federal Communications Commission**  
**1919 M Street, N.W., Room 222**  
**Washington, D.C. 20554**


**Re: CC Docket No. 91-213: In the Matter of Transport Rate Structure and Pricing, Third Memorandum Opinion And Order on Reconsideration And Supplemental Notice of Proposed Rulemaking, FCC 94-325; Released December 22, 1994.**

**Dear Mr. Caton:**

**Enclosed herewith please find an original and nine (9) copies of the reply comments of the Ordering and Billing Forum, under the auspices of the Alliance for Telecommunications Industry Solutions, Inc., - sponsored Carrier Liaison Committee filed in the above-referenced proceeding.**

**If you have any questions, please call me at (202) 434-8828.**

**Sincerely,**

  
**Susan M. Miller, Esq.**  
**Vice President and General Counsel**

COMMITTEES



**cc: Tariff Division, Common Carrier Bureau  
International Transcription Service, Inc.**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 ) **CC Docket No. 91-213**  
**Transport Rate Structure and Pricing** )  
 )

**REPLY COMMENTS OF THE  
ORDERING AND BILLING FORUM**

**Susan M. Miller, Vice President  
and General Counsel  
Alliance for Telecommunications  
Industry Solutions, Inc.  
1200 G Street, N.W.  
Suite 500  
Washington, D.C. 20005**

**OBF Moderator - Doyle Griffin  
OBF Assistant Moderator - Don Werner**

**February 16, 1995**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 ) **CC Docket No. 91-213**  
**Transport Rate Structure and Pricing** )

**REPLY COMMENTS OF THE  
ORDERING AND BILLING FORUM**

The Ordering and Billing Forum ("OBF"), an industry forum under the auspices of the Alliance For Telecommunications Industry Solutions, Inc. ("ATIS") - sponsored Carrier Liaison Committee ("CLC") hereby files these reply comments with the Federal Communications Commission (the "FCC" or the "Commission") in further response to the FCC's Third Memorandum Opinion And Order ("MO&O") On Reconsideration and Supplemental Notice of Proposed Rulemaking ("SNPRM"), FCC 94-325, released on December 22, 1994.<sup>1</sup> Specifically, the OBF by these reply comments seeks to provide an update on its work on a split billing prototype. Most importantly, the OBF is reporting that as of the date of the filing of these reply comments, the OBF has reached final resolution on a split billing prototype for those tariffs which provide for the fractionalization of the host company's facility charges. This most recent action is detailed herein.

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<sup>1</sup> A list of the parties, other than the OBF, filing direct comments are contained in Attachment A.

## **I. THE OBF'S INITIAL RESOLUTION OF A SPLIT BILLING PROTOTYPE**

The OBF's direct comments in this proceeding responded to the FCC's stated interest in its SNPRM for ". . . any split billing prototype under consideration by the OBF . . ." and the associated responsibilities including "percent of interstate use" ("PIU") reporting.<sup>2</sup> The comments provided an extensive history of the split billing issue in the OBF, a report on its most current status as an issue which had been worked by the OBF's Billing Committee and which had reached initial resolution as of the OBF's meeting held October 31 through November 3, 1994 (OBF #48), and an overview of the initial resolution itself.<sup>3</sup>

As detailed in the OBF's direct comments, the split billing prototype, with both paper and billing data tape requirements, accommodates an option for use by access providers who's tariffed split billing fractionalizes the host company's facility charges. The OBF's direct comments detailed the initial resolution which defined the "host customer of record" ("HCR") as the owner of the facility being billed for the highest facility and the "subsequent customer of record" ("SCR") as the service user being billed for the fraction of that higher facility.<sup>4</sup> The OBF prototype, explained fully in the direct comments, also includes the information to be provided for both the HCR and the SCR.<sup>5</sup> The OBF Billing Committee also agreed that PIU reporting would be the responsibility

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<sup>2</sup> SNPRM, at para. 146.

<sup>3</sup> "Initial closure," the first phase in closing an issue, gives official notification to the industry, via publication in the OBF meeting record, that the committee has completed its work and reached an initial resolution of the issue before it. If an OBF participant has any concerns with the proposed resolution of an issue in "initial closure," they are encouraged to submit contributions for further consideration.

<sup>4</sup> See OBF Comments, at pp. 11-12.

<sup>5</sup> See OBF Comments, at pp. 12-13.

of the billed party and should be reported in the usual manner. With this prototype reaching initial resolution in November 1994, the OBF participants, consistent with OBF operating principles, were given one more opportunity to review this agreement prior to its final presentation at OBF # 49 in early February, 1995.

## II. THE OBF'S FINAL RESOLUTION OF A SPLIT BILLING PROTOTYPE

As stated in its direct comments, the OBF agreed to provide a follow-up report on the status of the split billing work in the reply comment phase of this proceeding.<sup>6</sup> Accordingly, the OBF reports that it reached final resolution on the split billing prototype at its February 6-9, 1995 meeting, held just five days after direct comments were due in this proceeding.<sup>7</sup> The version of the prototype as well as the status history of the split billing discussions which led to the final closure and consensus resolution of Issue 991 at the February OBF meeting is attached.<sup>8</sup> No changes were made to the prototype presented as the initial resolution in the OBF's direct comments filed on January 31, 1995.

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<sup>6</sup> See OBF Comments, at p. 11 and at p.13.

<sup>7</sup> The OBF recognizes that while it reached final resolution on a split billing prototype, some of its participants took positions in their direct comments to oppose the implementation of split billing via tariff. Thus, it should be understood that the OBF prototype was developed to accommodate a tariffed offering for transport split billing. Those OBF participating companies which have opposed split billing via tariff have agreed through the consensus process to support the OBF's resolution as the manner in which to proceed should there be a regulatory mandate to do so.

<sup>8</sup> See Attachment B for a copy of the final resolution and pages 51-56 of the status history of OBF Issue 991. These status history pages are part of the comprehensive status history filed as Attachment B of the OBF Direct Comments filed January 31, 1995, and accordingly, should be considered in conjunction with that record. An issue in "final closure," the last phase in closing an issue, serves as official notification to the industry that consensus has been reached on resolution of an issue.

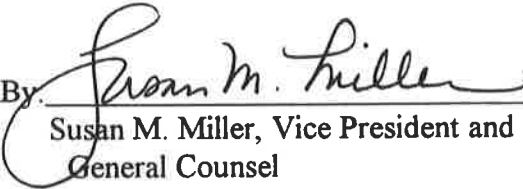
**III.**

**CONCLUSION**

Accordingly, the OBF respectfully submits its final resolution of a split billing prototype in response to the Federal Communications Commission's SNPRM, CC Docket 91-213.

Respectfully submitted,

ALLIANCE FOR TELECOMMUNICATIONS  
INDUSTRY SOLUTIONS, INC.

By:   
Susan M. Miller, Vice President and  
General Counsel

ORDERING AND BILLING FORUM  
LEADERSHIP:

Doyle Griffin - Moderator

Don Werner - Assistant Moderator

Comments Filed in CC Docket No. 92-213

**Ad Hoc Telecommunications Users Committee**  
**Allnet Communications Services, Inc.**  
**American Telephone and Telegraph**  
**Ameritech**  
**Bell Atlantic**  
**Bellsouth Telecommunications, Inc.**  
**Cincinnati Bell Telephone Company**  
**Citizens Utilities Company**  
**Competitive Telecommunications Association**  
**GTE Service Corporation**  
**John Staurulakis, Inc.**  
**Louisiana Public Service Commission**  
**MCI Telecommunications Corporation**  
**National Exchange Carrier Association, Inc.**  
**NYNEX Telephone Companies**  
**Pacific Bell and Nevada Bell**  
**Rochester Telephone Corporation**  
**Southern New England Telephone Company**  
**Southwestern Bell Telephone Company**  
**Sprint Corporation**  
**U S WEST Communications, Inc.**  
**United States Telephone Association**

# Ordering and Billing Forum Issue Identification Form

OBF Issue Number	991
Date Accepted: 2/28/94	at OBF #45
Initial Closure: 11/3/94	at OBF #48
Final Closure: 2/9/95	at OBF #49
Issue Category:	RESOLVED

## Part A, Page

Issue Title: Split Billing Requirements Under Local Transport  
Restructure

**Issue Statement:** The recent FCC Order in the Matter of "Local Exchange Carrier Switched Local Transport Restructure Tariffs" (DA 93-1579) directs the Local Exchange Carrier (LEC) community to identify any problems/issues associated with Split Billing to the Ordering and Billing Forum for Resolution.

This issue allows for the discussion of problems/issues identified by AP and AC representatives. This discussion will include, but not be limited to, the questions of "who is the customer of record" and "what are the specific PIU reporting requirements".

### Impact of Other Issues or Procedures:

**Desired Results:** A thorough discussion of split billing problems/issues resulting in the development of a consistent format for split billing the "flat rated" switched access charges (introduced as a result of Local Transport Restructure) for display on either a Switched Access or Facility Access bill.

**Committee Assignment:** Billing

**Associated Committee:** ASR

**Issue Champion:** AP Billing Committee  
Representatives

**Company:**

**Address:**

**Telephone:**

**Resolution:**

(See Next Page)



# Ordering and Billing Forum Issue Identification Form

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Part A, Page

Issue Title: Split Billing Requirements Under Local Transport  
Restructure

**Resolution:** The paper and BDT requirements for Split Billing have been identified below for use by APs with split billing tariffs that provide for the fractionalization of the Host Customer's facility charges (e.g., Entrance Facility, Direct Transport and Multiplexers). The Host Customer of Record (HCR) is the customer being billed for the highest facility; the Subsequent Customer of Record (SCR) is the customer being billed for a fraction of that higher facility.

The following information should be provided for **both** the HCR and SCR.

1. New UDP-like USOCs should be displayed on the CSR (one for switched and one for special). [There are no unique USOC requirements for rateable elements.]
2. Cross reference data should be "floated" following UDP-like USOCs. This data includes:
  - The Billing Account Number of the Related Account (RA FID).
  - The actual slot assignments that were activated [HCR only]
  - Identification of who is on each channel (FID such as ACNA to identify name) [HCR only]
  - CFA (SCR only)
3. The effective date of the Split Billing Arrangement (Service Establishment Date).
4. If split billing does not apply to all rateable USOCs on the circuit, then a unique FID should be used to indicate applicable rate element USOCs.
5. Issue 803 Guidelines should be used for rerating for both the HCR and SCR.
6. There should be an identification of a split billing vs. a shared use arrangement (i.e., add total number of split billed channels).

In addition to the above, the following information should be displayed for the SCR:

1. The CLF of the facility being fractionalized should be restated on the circuit listing section of the bill and the CSR (either using the CLF FID or a fictitious FID.)
2. The Circuit Listing page should reflect indicator/code set identifying split billing.

The attachment to this issue provides a prototype CSR which demonstrates the display of some of the required CSR information.

It should be noted the ASR will be the vehicle the ACs will use to "advise" the APs on who should be billed. PIU reporting is the responsibility of the billed party.

In accordance with the resolution to OBF Issue 190, this issue is referred to the CABS BOS Technical Review Group

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<b>Issue Category:</b>	RESOLVED

## Part B, Page

Issue Title: Split Billing Requirements Under Local Transport  
Restructure

### STATUS HISTORY (PAGE 51)

#### Activity Between OBF #48 and OBF #49

On December 22, the FCC released its Third Memorandum Opinion and Order (MO&O) in the Matter of Transport Rate Structure and Pricing. Included as part of this Order, was a Supplemental Notice of Proposed Rule Making (NPRM) for Split Billing.

A conference call that included the OBF Leadership, Billing Committee Co-Leaders, ATIS Counsel to the OBF (Susan Miller) and Bellcore Secretaries was held January 10, 1995 to discuss the NPRM. Based on interpretation of Paragraph 146 of that Order, it was agreed the FCC was anticipating some type of update/response from the OBF. As such, Susan Miller agreed to put together comments that would be filed with the FCC on January 31. (Comments were due February 1.) The intent of the comments was to provide the FCC with an updated status and historical background of the Billing Committee's discussion of split billing that would essentially serve as a formal "for the record" update. As part of this activity, it was further agreed the Billing Committee membership should be given an opportunity to review the material prepared by Ms. Miller prior to submission to the FCC. In order to accommodate this decision, a "schedule of events" was also developed and a Billing Committee conference call was scheduled for January 27. The following paragraphs provide a summary of this call.

#### Billing Committee Primary Company Contacts Conference Call (1/27/95)

Representatives from the following companies participated: Ameritech, Bell Atlantic, U S WEST, S.N.E.T., ALLTEL, MCI, and Sprint LDD. At the start of the call, Billing Committee Co-Leader Rodney Sampson noticed that an erroneous call-in number had been provided by Mary Beth Johnson (Billing Committee Secretary). This, in part, accounted for the limited number of participants<sup>1</sup>. However, given the tight schedule, coupled with the fact that both the AP and AC community were represented, it was agreed the call should continue.

Susan Miller reported she had received comments from 5 companies (MCI, Sprint LDD, AT&T, GTE and Bellcore [in its capacity as Committee Secretary]). Ms. Miller advised she had incorporated all comments and proceeded to review them. The most substantive comments centered around the discussion of the April 7, 1994 interim conference call and the lead-in paragraph for OBF #46.

<sup>1</sup> In contacting several primary company contacts following the call, the Billing Committee Secretary confirmed that at least three companies did not participate because of the wrong number (i.e., GTE, AT&T and AT&T Easy Link). At least two additional companies had not received the fax of Susan Miller's draft (i.e., Wiltel, and CSC Intelicom). Two other companies indicated they had not intended to participate because they were either satisfied with the draft as written, or were busy preparing their company's response to the NPRM (i.e., NYNEX and NECA).

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Issue Category:	RESOLVED

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Issue Title: Split Billing Requirements Under Local Transport  
Restructure

## STATUS HISTORY (Page 52)

### Activity Between OBF #48 and OBF #49 (Continued)

#### Billing Committee Primary Company Contacts Conference Call (Continued)

In regard to the April 7 interim conference call, concern had been expressed that the paragraph could be interpreted that APs had previously indicated they would offer a tariffed split billing option; however, after further investigation, they reconsidered their position. In addition, the paragraph did not take into consideration the other reasons for not reaching closure on the call (i.e., different methods being proposed to meet the customers' requirements). Based on further discussion, this paragraph was rewritten and accepted by the group.

In regard to OBF #46, Ms. Miller advised the ACs responding to her draft did not believe their position was accurately reflected. While billing and collection was discussed (and was briefly considered by the AC community), the AC community wanted their "final" position reflected, i.e., it was an access service and not Billing and Collections. Since this was consistent with the Status History (see page 21), the group agreed this change should be made.

After making additional changes, the group agreed the document could be submitted to the FCC. However, Mary Beth Johnson advised she was contacted by Southwestern Bell shortly before the conference call. SWBT had not received a copy of the original draft and expressed concern they would not be given an opportunity to comment. Ms. Johnson asked if there was anything that could be done to accommodate them. With the approval of the group, Ms. Miller agreed to accept SWBT's comments if they were provided to her by no later than Noon, January 31. Ms. Miller was questioned as to what would be done if SWBT's comments proved to be substantial or "undid" the work that was done on this call. Ms. Miller stated that if this was the case, she would call an emergency conference call. <sup>2</sup>

<sup>2</sup> Upon reviewing SWBT's comments, Ms. Miller requested a conference with the Billing Committee Co-Leaders, Secretary and SWBT. While SWBT's comments did not impact the work done on the call, Ms. Miller was concerned about the "tone". Specifically, SWBT requested the comments filed by Ms. Miller should:

1. emphasize the OBF does not control or dictate how APs are to offer a service,
2. clarify the resolution does not accommodate all split billing options,
3. clarify the resolution does not resolve a complex issue (i.e., all facets of split billing).

In working with the Billing Committee Co-Leaders and SWBT, it was agreed the draft will point out the first point by amending an existing sentence (i.e., However, resolution implementation is voluntary *and the OBF does not control how services are offered*). In regard to the second point and third points, it was agreed a footnote (i.e., 26) would be added to reflect the following: *The OBF resolution does not resolve the larger issue as to whether FG A service should be split billed and tariffed. Nor does it accommodate all split billing options. It does, however, establish a prototype for use by APs who chose to tariff split billing fractionalization of the host company's facility charges.*

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Issue Title: Split Billing Requirements Under Local Transport  
Restructure

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## STATUS HISTORY (Page 53)

### Activity Between OBF #48 and OBF #49

Prior to the conclusion of the call, some representatives questioned if the issue would be held in Initial Closure because of the FCC activity. The Billing Committee Co-Leaders stated the Billing Committee Primary Company contacts were advised this issue would be placed on the agenda for OBF #49 as the first "open" issue to be discussed. These representatives were asked to come prepared to provide their company's position in light of the NPRM. The issue may be held in Initial Closure depending upon the outcome of these discussions.

Ms. Miller reminded the group that she will be preparing updated comments for the FCC following OBF #49. If the issue is held in Initial Closure because of the FCC activity, she will so reflect this result in the comments. Ms. Miller's updated comments will be faxed to Billing Committee Primary Company contacts as soon as they become available. A conference call will be held February 14 (beginning at 3 p.m. Eastern) to allow interested members of the Billing Committee a final opportunity to comment. Ms. Miller will incorporate any additional comments and the update will be filed with the FCC on February 16.

### OBF #49 (February 6, 1995)

Ms. Castle began discussion by reminding the Committee of the activity that took place since the last OBF (refer to pages 51-53 of this Status History). As a result of this activity, Susan Miller (ATIS Counsel) filed comments, on behalf of the OBF, with the FCC on January 31, 1995. These comments included a summary of the Billing Committee's efforts in resolving this issue, as well as the complete Status History (up to and including OBF #48) and supporting exhibits. An abbreviated copy (i.e., sans Status History and Exhibits) were provided to all Committee representatives. Ms. Castle thanked the Committee for its efforts in assisting in the development of these comments. She then questioned if the issue could still be submitted into Final Closure.

A SWBT representative explained that her company still wants to implement split billing via Billing & Collections (B&C), and have filed comments accordingly. Based on a preliminary review of other companies' comments, there seemed to be a mixture of approaches (e.g., B&C, tariff). Given this mixture, it is uncertain how the FCC will actually rule. However, she believed the Committee made a good faith effort in developing a resolution that would accommodate at least one possibility (i.e., tariffed, with fractionalization of charges). Therefore, SWBT would support closure of this issue. However, she questioned what would happen if the FCC responds with a different alternative.

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Issue Title: Split Billing Requirements Under Local Transport  
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## STATUS HISTORY (Page 54)

### OBF #49 (Continued)

The Bell Atlantic representative indicated she still had a problem supporting the restatement of the CLF. Ms. Castle questioned if Bell Atlantic could use the other alternative, i.e., display of a fictitious CLF. The Bell Atlantic representative responded they had considered this alternative, however, it does not effectively resolve the problem. Bell Atlantic would have difficulty calling up the same circuit ID for the same customer. While a fictitious FID may work from a DS3 to DS1; additional fictitious FIDS would have to be created for every circuit activated off the DS1, resulting in not one, but numerous, fictitious FIDs being created. (This type of FID perpetuation causes the data to become unmanageable.) Bell South, U S WEST, and NYNEX representatives also indicated they had a problem with this portion of the resolution statement. The ALLTEL representative, however, indicated the issue should not be pulled from closure.

Since Susan Miller was present, Ms. Castle asked for her input. Ms. Miller explained the FCC would be given an update of this issue based on discussions at this OBF. If the Committee elects to hold this issue, the reasons would be explained in this update. She impressed upon the Committee there would be split billing, and split billing would be tarified. Ms. Miller suggested the Committee keep this in mind as the discussions continued. In addition, she advised Barbara Esbin has been replaced by David Nall who has been brought up to date on this issue. Ms. Castle thanked Ms. Miller for her input.

At the request of a Committee representative, Ms. Castle reviewed the definition of "consensus". Based on discussion, it appeared Committee representatives did understand each other's point of view. She then questioned if the resolution needed to be rewritten based on the concerns being raised by AP representatives.

The AT&T Easy Link representative indicated that restatement of the CLF is a major customer requirement. The Witel representative supported this position.

The U S WEST representative questioned if the CLF could be labeled a "customer preference". He believed the Committee made a good faith effort to come to resolution; however, it should be recognized that some APs simply cannot provide this information. He explained U S WEST had several concerns about restatement of the CLF (e.g., data integrity [having a unique circuit ID ensures double billing would not occur]).

The AT&T representative expressed concern over this approach since the resolution reflected the customers' requirements. She recognized that some APs may not be able to accommodate all these requirements within a specific Version window. A delay in providing this information would be acceptable if she knew APs were working toward implementation. The NYNEX representative indicated she was uncomfortable with this approach because it still did not totally eliminate the initial concern about CLF restatement.

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Part B, Page

Issue Title: Split Billing Requirements Under Local Transport  
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## STATUS HISTORY (Page 55)

### OBF #49 (Continued)

The BellSouth representative also expressed his concern about CLF restatement since it would not only change their billing system, but would result in numerous changes to their "support structures" as well. However, he also indicated BellSouth wants to provide the customers with the information they require, and they would make a good faith effort to meet these requirements.

The Bell Atlantic representative indicated they could meet all the customer requirements except the CLF. Bell Atlantic would work toward providing this information, but could not agree to a specific Version implementation time line. Representatives questioned when the split billing requirements would be incorporated. TRG representatives in attendance advised they would be reviewing these requirements for incorporation into Version 25 (which becomes effective March, 1996).

AP representatives questioned if the implementation issue could be accommodated in the resolution statement.

An MCI representative indicated this should not be part of the resolution statement. He observed many companies probably would not tariff split billing unless they have to. However, if the FCC does order split billing and specifies a time frame for implementation, APs would have to comply. He observed the Committee had been discussing these requirements for several months and he believed the resolution, as it was written, reflected the consensus of the Committee. The Sprint LDD supported this observation. She believed AP concerns were accommodated by the introduction of an alternative (i.e., a fictitious circuit ID), and was surprised to learn there were still concerns. The Bell Atlantic representative reminded the Committee she had expressed concern with this approach throughout all the discussions.

The AT&T representative acknowledged the AP's concerns, but she also indicated CLF restatement remained a requirement. She again questioned if APs could agree to work towards providing this information even though it may be beyond the implementation of Version 25.

The ALLTEL representative expressed concern about the reference to a specific version. She reminded the Committee that this type of discussion normally does not occur. She suggested the reference to a specific version be replaced with "in a timely fashion".

Following further discussion, it was agreed that the resolution need not be revised. Reflection of the concerns and the fact some APs may not be able to initially implement the CLF in this Status History would be sufficient. For the record, eight AP indicated they would not be able to initially implement the CLF. However, these companies agreed they would work towards a "timely" implementation. **With this understanding, it was agreed, the issue could be submitted into Final Closure.**

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Part B, Page

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## STATUS HISTORY (Page 56)

### OBF #49 (Continued)

In closing, Ms. Castle reminded the Committee a conference call would be held on February 14,<sup>3</sup> beginning at 3 p.m. (Eastern). The purpose of the call is to afford Billing Committee representatives an opportunity to provide their input to updated Comments developed by Susan Miller prior to submission to the FCC. (The due date for final comments is February 16.)

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<sup>3</sup> This call will be hosted by Bellcore. The dial-in number is 908-336-6000; the password is "1234". If there is difficulty experienced, call 201-740-7000.

**CERTIFICATE OF SERVICE**

**I, Vermel Allen do hereby certify on this 16th day of February, 1995, that I  
have served a copy of the foregoing document via first class mail, postage prepaid, upon the  
parties listed:**

  
\_\_\_\_\_

**Vermel Allen**



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