

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: September 13, 2018
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula, Office of the General Counsel *S.M.C.*
RE: Docket No. 20021166-TP

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

RECEIVED-FPSC
2018 SEP 13 PM 2:23
COMMISSION
CLERK



6250 N. River Road, Suite 12-100
Rosemont, IL 60018
Office: 800.588.4485 ♦ Fax: 847.319.4001

April 8, 2002

Via US Mail & email @ vsandusky@apcc.net; apcc@apcc.net

A.P.C.C.
Mr. Vincent Sandusky, President
10302 Eaton Place, Suite 340
Fairfax, Virginia 22030

RE: Billing Agreements for CLEC's

Dear Mr. Sandusky,

I would like to bring your attention to a serious issue that should be of major concern to the A.P.C.C. and its members. The issue I am referencing is the majority of CLECs' unwillingness to sign billing agreements with billing companies. This is now a huge portion of the call degradation that the PSP's are seeing in the way of unbillable calls. Allow me to elaborate on this issue and explain how it has escalated to the tune of hundreds of thousands of dollars per month for Qwest Communications and its customer base.

Over the last two years we have realized that validated (as being a billable number) and processed calls were rejected due to being moved to a CLEC. At times, it could take up to 180 days before we receive information that the call record was rejected and the ANI was moved. The calls were completed but both the Operator Service Company and the PSP were required to write-off the call. Our network and the PSP's equipment were being used and tied up for calls that do not produce real revenue. This could be revenue for our industry however, since there is not an agreement with the CLEC, we can not bill for it.

In order to prevent this from occurring, we have put together a "negative database" so that the calls are screened and rejected before the call originates. This is a short-term solution that eliminates the utilization of our equipment for revenue that will not come to fruition for our industry.

Qwest Communications, as well as its billing company, has aggressively persuaded the CLEC's to put agreements in place but the cost to do this versus the revenue for the CLEC makes this action not worth their effort. I believe that this should no longer be a business decision rather than a regulatory requirement that they must facilitate this as done by the ILECS. I also believe that the strength of your organization as well as the state associations is instrumental in making this happen.

Please understand that the numbers I have shared with you is only Qwest Communications' portion. If you combine the other operator service companies I am confident that this number will triple at the very least. It would be my pleasure to further discuss with you and to assist in anyway that I can in resolving this issue.

Respectfully,

Duane Cutler
Regional Vice President of Sales

June 14, 2002

BY FACSIMILE

Samantha Cibula
Florida Public Service Commission
Office of General Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Call Completion Rule – Request for Workshop

Dear Ms. Cibula,

The purpose of this letter is to request a rule development workshop pursuant to the notice issued on May 20, 2002, and Rule 28-103.002, Florida Administrative Code.

WorldCom believes another workshop is necessary for clarification of portions of the rule as well as to discuss the substance of the rule.

Sincerely,



Donna Canzano McNulty

**WORLD.COM, INC.'S PROPOSED MODIFICATIONS
TO STAFF'S PROPOSED RULES**

25-4.119 Line Information Database Maintenance

Within 6 months of the effective date of this rule, each local exchange telecommunications company shall:

(1) Update the Line Information Database (LIDB) with the account ownership code of the Alternative Local Exchange Company (ALEC) claiming the customer, provided the ALEC has contracted with the local exchange company to provide such information or has purchased the line directly from the local exchange company; and

(2) Provide ALECs access to LIDB, or provide updates on a contractual basis for each ALEC that enters into a contract.

25-24.830 Consumer Service

(1) The quality of service information in paragraph (1)(d) of rule 25-24.825 shall be provided, verbally or in writing, upon request to any person inquiring about the company's basic local exchange telecommunications service. IN addition, the above information shall be provided in writing before or in the basic local exchange telecommunications customer's first bill for service. The above information shall be expressed in simple words, sentences, and paragraphs. Unnecessarily long, complicated, or obscure phrases or acronyms must be avoided.

(2) Prior to a customer agreeing to obtain local service from an Alternative Local Exchange Company (ALEC), the ALEC shall notify the customer of services not available such as if third-party billing or receipt of a collect calls is not available.

25-24.840, Service Standards

(1) Each provider of alternative local exchange telecommunications service shall make access to 911 [deleted 9-1-1] emergency services available to each of its basic telecommunications service customers at a level at least equivalent to the service provided by the incumbent local exchange company.

(2) [delete – By July 1, 1997] Access to 911 services shall be maintained for the duration of any temporary disconnection for non-payment of a residential subscriber's local service.

(3) Within 6 months of the effective date of this rule, each Alternative Local Exchange Company (ALEC) shall:

(a) Enter into a billing and collection agreement with a company capable of billing telecommunications services either directly to the end user or through a local exchange company billing system; or

(b) Provide billing name and address information, at a reasonable cost and in a timely manner, to any telecommunications company that requests the information.

(4) Each ALEC that does not have a billing and collection agreement to provide billing to third parties or billing for collect calls must populate, or contact with the LEC to populate, toll billing restrictions in the Line Information Database (LIDB).

(4) If the ALEC or LEC fails to comply with the provisions of subsections 3(a) or 3(b), then the ALEC or LEC shall place a collect call restriction in the Line Information Database (LIDB).

(5) Each ALEC shall update the LIDB daily so that the LIDB reflects accurate account ownership and toll restriction information. Each ALEC shall either update this information directly into LIDB or contract with the appropriate local exchange company for daily updates.

(6) The ALEC or LEC is responsible for charges associated with the termination of uncollectible calls if it fails to update the LIDB as described in subsection 5.

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

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TALLAHASSEE, FLORIDA 32302-1876
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RECEIVED

02 JUN 17 PM 12:34

FLA PUBLIC SERVICE COMM.
OFFICE OF THE
GENERAL COUNSEL

June 14, 2002

**BY TELECOPIER
AND U. S. MAIL**

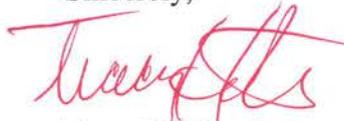
Ms. Samantha Cibula
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

In Re: Rule Development for Proposed Adoption of Rule 25-4.119, and Proposed
Amendment of Rules 25-24.830 and 25-24.840

Dear Ms. Cibula:

Pursuant to the Notice of Proposed Rule Development, issued on May 20, 2002, in the above referenced matter, and in accordance with Rule 28-103.002, Florida Administrative Code, AT&T Communications of the Southern States, LLC, hereby requests that the Commission conduct a rule development workshop. AT&T will be affected by the requirements set forth in the draft rules and believes that a workshop is necessary to clarify the specific requirements in the currently proposed rule language.

Sincerely,



Tracy W. Hatch

TWH/amb

June 14, 2002

BY FACSIMILE

Samantha Cibula
Florida Public Service Commission
Office of General Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Sincerely,



Donna Canzano McNulty



6250 N. River Road, Suite 12-100
Rosemont, IL 60018
Office: 800.688.4485 ♦ Fax: 847.319.4001

April 8, 2002

Via US Mail & email @ vsandusky@apcc.net; apcc@apcc.net

A.P.C.C.
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10302 Eaton Place, Suite 340
Fairfax, Virginia 22030

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Respectfully,

Duane Cutler
Regional Vice President of Sales

BellSouth Telecommunications, Inc.
Regulatory Relations
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

nancy.sims@bellsouth.com

Nancy H. Sims
Director

850 222 1201
Fax 850 222 8640

December 21, 2001

Samantha Cibula
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Subject: Draft Rules – Billing of Collect or Third Party Calls to ALEC Customers

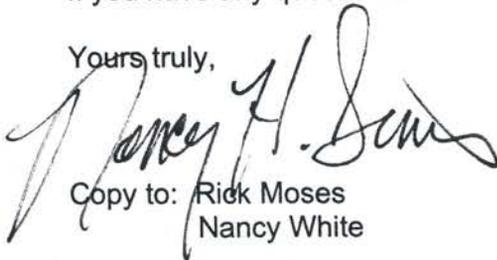
Dear Ms. Cibula:

This letter is in response to your e-mail of December 10, 2001, requesting any comments or concerns with the Staff's draft amendments to Rules 25-24.830 and 25-24.840, F.A.C. and Rule 25-4.119, F.A.C. After reviewing these revisions, BellSouth has no changes to suggest to the draft wording.

We do want to inform the Staff that BellSouth has completed the population of OCN (Owning Company Number, synonymous to Account Owner or AO) in the Line Information Database (LIDB), and this data was made available to the industry via the posting of an industry notification letter on October 4, 2001. Currently, contracts are available for ALECs who desire to store their data in the BellSouth LIDB. Direct access to LIDB is not available. BellSouth will provision (e.g., add, update, and delete) data associated with ALEC's customers. This updating to LIDB is done on a daily basis.

If you have any questions or need any additional information, please give me a call.

Yours truly,



Copy to: Rick Moses
Nancy White

RECEIVED
01 DEC 21 AM 10:36
FLORIDA PUBLIC SERVICE COMMISSION
DIVISION OF APPEALS



RECEIVED
02 FEB -8 PM 3:50
FLORIDA PUBLIC SERVICE COMM.
DIVISION OF APPEALS

February 7, 2002

Ms. Samantha M. Cibula
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

via Overnight Mail

Re: Undocketed Rule Development for Proposed Adoption of Rule 25.4.119, and
Amendments to Rules 25-24.830 and 25-24.840, F.A.C.

Dear Ms. Cibula,

Please accept this letter as request for a rule development workshop in the above matter.

Florida Digital Network, Inc., ("Florida Digital") maintains that the draft rules, as written, are not entirely clear, are unfair and unduly burdensome, and, therefore, a workshop is necessary so interested persons can discuss possible revisions thereto.

As a general matter, Florida Digital takes issue with any suggestion that the sole cause for payphone calls not being completed to ALECs stems from ALECs and the ALECs' and their customers' refusing payment to payphone providers. Florida Digital maintains that the causes for call completion failures from payphones certainly go beyond this.

In any case, Florida Digital asserts that some of the proposed rules should be withdrawn or, at a minimum, revised. Proposed Rule 25-24.830(2), as written, imposes on all ALECs the burden to notify prospective customers of service unavailability even when the ALEC is not aware services may not be available due to causes outside its control. If not withdrawn, this proposed rule must be revised to state that a notification requirement pertains if the ALEC elects not provide such services or does not comply with other applicable requirements predicate to providing services. In fairness, the Commission should also consider whether a similar notification requirement should be imposed on payphones. Additionally, FDN asserts that proposed 25-24.840(5) contains two overlapping and contradictory statements that should be clarified. FDN also requires additional information relative to how ILECs intend to comply with proposed 25-4.119.

If not inconvenient, I request that prior to scheduling another workshop in this matter, the staff consult with expected participants for scheduling conflicts.

If you have any questions regarding the enclosed, please call me at 407-835-0460.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Feil". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Matthew Feil
Florida Digital Network
General Counsel