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September 27, 2001

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COMMISSION
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Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Undocketed
Pay Telephone Problems in Confinement Facilities

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Post-Workshop Comments for filing in the above matter. If there are any questions regarding these comments, please contact me at 813-483-2617.

Sincerely,


Kimberly Caswell

KC:tas
Enclosures

c: Rick Moses, Chief, Bureau of Service Quality (w/e)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Pay Telephone Problems) Undocketed
in Confinement Facilities) Filed: September 27, 2001
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VERIZON FLORIDA INC.'S POST-WORKSHOP COMMENTS

In accordance with Staff's instructions at the August 29, 2001 workshop in this proceeding, Verizon Florida Inc. (Verizon) submits its comments addressing issues related to inmate call screening, line-information database (LIDB) functionality and alternative local exchange carrier (ALEC) participation in billing and collections agreements.

At the workshop, parties raised billing problems related to inmate-originated calls from payphones in confinement facilities. These asserted problems included blocking of inmate calls by the originating carrier and inability to bill completed inmate calls because the terminating ALEC carrier does not have a billing and collection agreement with the originating carrier.

Before discussing these interrelated problems, it is necessary to understand LIDB functionality. LIDB originated as a collection of incumbent local exchange carrier (ILEC) owned computer databases that stored, among other things, billing validation information on switched local exchange lines. Since no other entity provided local service, the validation concept and process for identifying who "owned" a specific telephone number was fairly straight-forward. To validate a number, the call originator needed to identify the ILEC based on the NPA/NXX, and query that ILEC's LIDB database. A network protocol to support this procedure was developed and all switch

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vendors were able to send and receive the appropriate information in compliance with this protocol.

With the deregulation of local service and the entry into the market of both facilities-based ALECs and local service resellers, as well as the implementation of local number portability, the concept of LIDB validation has had to expand significantly. What a call originator refers to as a “LIDB dip” now includes access to an extensive network of databases designed to keep track of the current status of a given telephone number, regardless of who owns it. This stored information includes, but is not limited to, the name of the company providing the line to the subscriber, the presubscribed interexchange carrier (IXC), and any billing restrictions on the line.

Prior to the current state of deregulation, the industry-standard definition of a “LIDB dip” was a query to the LIDB database of the ILEC that “owned” the NPA/NXX of the billing number. The response to that “dip” was a three-digit “return code” which indicated whether the call was allowed and the ILEC’s billing RAO code. This was sufficient for the call originator to know if the call would be billable if completed.

With deregulation, additional LIDB databases for facilities-based ALECs were added, if the ALEC chose to provide this information. The LIDB “dip” process also had to be modified to provide navigation down to the 10-digit telephone number to determine if a specific number had been ported (reassigned) to a facilities-based carrier.

In addition, ALECs are able to purchase lines from the ILEC and resell them. This presents the problem of lines that are “owned” by an ILEC but can only be billed against by sending the messages to the reseller. The LIDB “dip” for resold lines comes to the ILEC LIDB database for validation. The historical response code to such a dip is

inadequate to alert the “dip” initiator that the line has been resold and billing might be a problem. Without knowing who the reseller is at the time the call is placed, the call originator might allow unbillable calls to complete. The call originator will only find out the calls are unbillable when they are submitted to the ILEC for billing.

Attachment 1 contains the basic process flow of a LIDB query from a CPE provider through a hub provider and the various information databases. (The boxes in yellow highlight the situations Mr. Townsend raised at the workshop. The blue shaded boxes highlight the proposed solution to return a 4-digit OCN.)

When a call is placed from an inmate payphone in a confinement facility, the originating call carrier (which may be an ILEC or another carrier) will launch a query to the LIDB to obtain several items of information about the terminating line. Depending upon what information is returned to the switch originating the inmate call, the call may either be allowed to enter the network for attempted completion by the terminating carrier, or it may be blocked.

If, for example, the line is restricted to prevent billing for collect or 3rd-number-billed calls, the call will not be allowed to enter the network to attempt completion to the restricted number. It will be blocked. Inmate calls are also commonly blocked when the LIDB does not return the operating company number (OCN - the name of the called party's carrier), to the originating switch. If the originating switch does not know the OCN, it cannot pass the bill record to the appropriate carrier for end-user billing, and so the call is blocked.

Another scenario in which calls from inmate payphones are blocked is where the LIDB returns the OCN to the originating switch, but that switch determines that there is

no billing and collection agreement with the company identified by the OCN. In the absence of such an agreement, it is very unlikely that the originating switch carrier will be able to bill for that call, and will thus block it.

In response to this issue, the industry has settled on the expansion of the LIDB response to include a 4-digit OCN. ILECs are currently in the process of adding the OCN to each telephone number stored in their LIDB databases in addition to any billing restrictions to which the line may be subject (*e.g.*, collect or 3rd number call block).

However, in addition to the ILEC being able to provide the OCN information to the “dip” originator, the switches originating the “dip” must be able to accept the expanded LIDB response. At this time, some switches can accept the new information but others cannot. Therefore, while the data may be in place in the ILEC LIDB database, the full functionality and use of this data has not been implemented throughout the network. This is a transition issue that will eventually be worked out as all switches interfacing with the network are modified to be compatible with the new LIDB standard.

Billing and Collections

While this transition will address the concerns about completing unbillable calls Mr. Townsend raised during the workshop, it does not, in itself, achieve the Florida Public Service Commission’s (Commission) objective of “completing every call.” In fact, more calls could be blocked when the call originator can positively identify called numbers that can’t be billed prior to call completion. If the LIDB “dip” returns an OCN that the originating switch determines has no billing and collection arrangement, the call

will be blocked. This is because ALECs are not required to have billing and collection arrangements with anyone. However, in addition to the LECs, there are a number of other entities that provide commercial billing and collection services to smaller carriers, which may include ALECs, to enable them to cost-effectively provide complete telecommunications service to their customers. Some of these billing agencies include NECA, Illuminet, ZPDI, and OAN.

Since the ALECs are held to a lower service standard than the LECs by state public service commissions, these limitations on calling options are not a problem in themselves. However, the ALECs are also not required to disclose those limitations to prospective customers. As the ALEC industry web site at www.NALA-PCA.org indicates, it is not ALEC policy to reveal the inability to receive collect calls until after the customer has purchased their services. (To find this section on the web site, select "Code of Ethics and Guidelines," then select "Guidelines.") Attachment II contains a printout of the NALA/PCA Guidelines for CLECs and ALECs. Under Basic Service Guidelines, paragraph III. C.6.a. (Attachment II, p. 2), the NALA specifically states that disclosure of the inability to accept collect calls is a post-sale notification item.

While this and other listed limitations may not be of concern to some customers, they are critical to others and should be disclosed prior to the sale. If this limitation is disclosed prior to sale, the customer is able to make an informed choice; if the restrictions are unacceptable, he can shop for a carrier that would provide more comprehensive calling options.

Maintenance

The Commission also asked for discussion on several LIDB issues related to maintenance. Verizon's LIDB database is maintained, automatically, on a virtual real time basis. Any service order activity, (e.g., new service, disconnect, changing restrictions, changing account owner, changing PIC), automatically interfaces to, and updates, the LIDB data base.

At this time, Verizon's LIDB database which serves Florida intrastate calling has the ability to return the OCN to any switch that has notified us of their ability to receive the new LIDB standard format. That is, any call originated as collect or 3rd number billed to a Florida Verizon LIDB line can be provided an OCN if the originating switch is capable of receiving the data. Florida Verizon LIDB lines include Verizon retail ILEC lines, resold lines, and lines of facilities-based ALECs which have contracted with Verizon to provide their LIDB service.

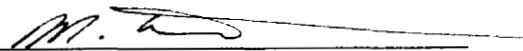
As is apparent from this discussion and the accompanying chart, the matter of changing the LIDB is an extremely complicated issue. In addition, LIDB service is interstate in nature and tariffed at the FCC. As such, the LIDB is not under this Commission's jurisdiction. Verizon respectfully suggests that any LIDB changes the Commission might support would be most appropriately forwarded to the FCC.

As to billing and collections-related issues, however, the Commission might consider, as a condition of obtaining or maintaining certification, requiring carriers to maintain billing and collection agreements with other carriers. At a minimum, carriers should be required to provide billing name and address upon request to allow their customers to be direct billed if they accept collect or 3rd number billed calls. In addition,

the Commission may require the ALECs to fully disclose limitations on the types of calls they can receive prior to signing up customers for service. Finally, the agency could also require resellers with no billing and collection arrangements to request a LIDB block from the underlying LEC to prevent fraudulent use of their service.

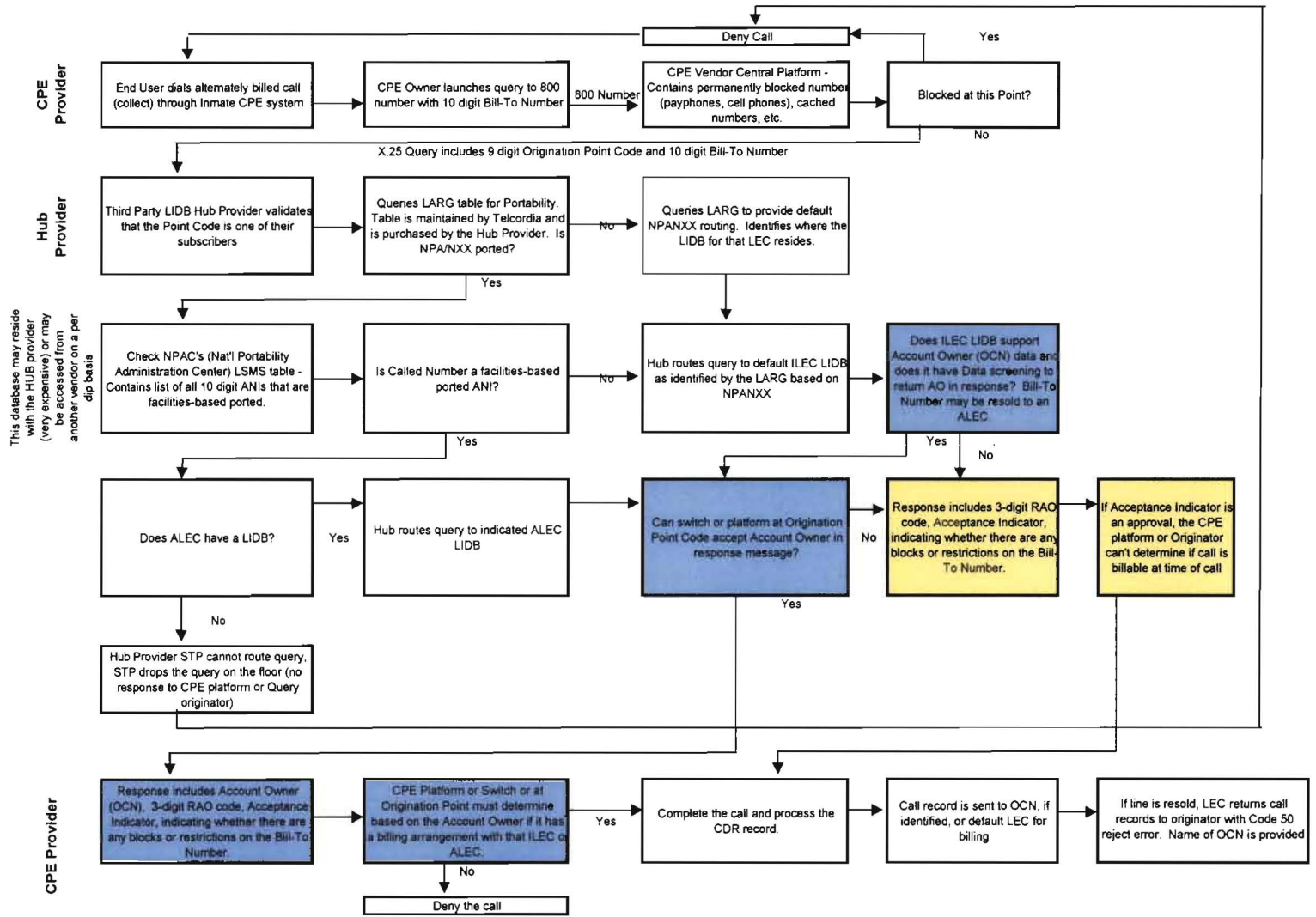
Respectfully submitted on September 27, 2001.

By:



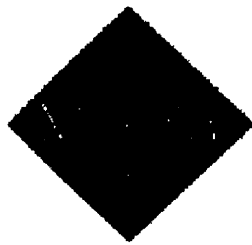
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Attorney for Verizon Florida Inc.



Glossary

LARG	LIDB Access Routing Guide	Single source for the LIDB access routing data used for administering and maintaining STP global title translation tables for LIDB. It identifies the the responsible signaling network control center, the routing effective date and the capability code. It gives routing information necessary to route an inquiry to the correct LIDB.
TPM-VHCD	Termination Point Master-Vertical & Horizontal Coordinates Data	The TPM-V&HCD supports various systems used in rating and billing calls and is the source for useful NPANXX related Data.
CDR	Call Detail Record	
ILEC	Incumbent Local Exchange Carrier	
ALEC	Alternate Local Exchange Company	
Account Owner		Account Owner (AO) is the name of the field in LIDB that stores the OCN/CC.
RAO	Revenue Accounting Office	
LIDB	Line Information Database	
STP	Signalling Transfer Point	



**NATIONAL
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GUIDELINES FOR CLECS AND ALECS

APPROVED BY NALA/PCA BOARD OF DIRECTORS

Basic Service Guidelines Summary

Basic Service Guidelines are those that all members of the Association are encouraged to conform with. Those guidelines are: Pre-sale and post-sale disclosure of information to subscribers must include the cost of all services or ability to calculate the costs, the name of the tariffed or responsible entity and any expiration date of features or services. Customer service shall include caller assistance, the ability to restore service, and maximum 24 hour credit turn-around. Customer service should be available a minimum of 8 working hours a day five days a week in the markets served. All services and features are to be held to the same guidelines.

Higher Quality Guidelines Summary

Higher Quality Guidelines include those that the Association recommends its members follow, and seek to achieve. They are consistent with the Association's goal of protecting the consumer. These include certain technical guidelines including redundancy, P. 01 standard conformance during the busiest hour, at least four hours of power backup during a power failure, security for the building which houses the physical location of the platform, a backup routine, ample spare component parts, reciprocity with another service bureau in the event of a disaster, monitored and alarmed systems with response capabilities 24 hours a day.

Basic Service Guidelines

Basic Service guidelines include what is expected to be minimum standards tied to membership in the Association. They represent the Association's view of minimal requirements for consumer protection.

- I. **Conformance with Regulations:** Member companies are pledged to comply with all local, state and federal regulatory laws and regulations governing any aspects of providing telecom service.
- II. **Types of Services Covered:** All types of communications related services, products, and features offered are governed by the standards. Services and features may differ in their purposes, however they all must conform to the same standards.
- III. **Disclosure:** Pre-sale disclosure includes a variety of customer disclosure methods including- Point of Purchase material, direct mail, posters nearby and/or via a domestic toll-free number.

A. Customer disclosure of important information, specified below, must be available prior to purchase or receipt of service by the subscriber.

1. The name of the tariffed entity must be made clear to the subscriber.
2. The service rates, fees and method of calculation must be available for the subscriber, including any variables.
3. The full charges associated with commencement of service.
4. The full extent of the service provided.
5. The disconnect procedure and policy of the service provider
6. The cost of providing in-house service on wiring, jacks or telephones is not the responsibility of the service provider.

B. Post Sale Disclosure relates to information that is printed and sent to the subscriber.

C. Disclosure of important information, specified below, must be available after purchase by the subscriber

1. The name of the tariffed entity must be provided.
2. The service rate or an appropriate method for the subscriber to calculate the rate plus all applicable surcharges or taxes and any added relevant variables must be printed on the monthly statement.
3. Any expiration date and/or policy that exist must be printed on the statement. If an expiration policy is not disclosed, the value of the service will be considered to have a carry forward indefinitely.
4. The full charges associated with commencement of service.
5. The full extent of the service provided.
6. A listing of the following services NOT provided, as basic service:
 - a. Ability to receive collect calls
 2. O+ Operator Services
 3. Third Number Calling
 4. 1+ Long distance
 5. Directory Assistance
 6. Casual Calling (1010XXX)
7. The date(s) on which payment is due
8. The disconnect procedure and policy of the service provider.
9. The cost of reestablishing service.
10. The cost of providing in-house service on wiring, jacks or telephones is not the responsibility of the service provider.
11. A customer service number that must be a local access or a toll-free number.
12. Provide refund policies and procedures.

IV. Customer Service is a set of services, specified below:

- A. Customer service must be able to provide live operator assistance during a minimum of eight working hours a day, five days a week in the markets served. At all other times, voice mail may be used but must be responded to by the next business day.
- B. Customer service must be able to provide resolution of issues concerning the subscriber's service and billing within 24 hours of response from the ILEC.
- C. Customer service must be able to restore telephone service after all outstanding

payments are made within a reasonable amount of time based on ILEC specifications.

- D. Customer service should be able to provide the following to the subscriber via a local access or a toll-free number:
1. Costs of added services
 2. Trouble shooting and repair service
 3. Take repair service orders
 4. Provide the status of installation
 5. Provide the status of repair orders
 6. Provide the outstanding balance due
 7. Provide the refund policies and procedures
 8. Initiate refunds

V. Customer Record Storage

All members should maintain customer records for a minimum of two years. Further, the Association recommends that such records be maintained in such a way as to facilitate prompt retrieval when legally valid requests for information are made.

VI. Customer Switching from Existing Service.

The members of the association are strongly opposed to the practice of SLAMMING and CRAMMING. To that end, the association requires members to comply with all regulatory and LEC issues and standard practices with regard to switching established service. They must follow all guidelines with regard to LOAs including either a signed LOA or verification by an independent third party verification company if verbal approval is given.

- A. If a customer requests a verifiable disconnect, with the intent to convert, members must release the disconnect notice within two business days of said request.

HIGHER QUALITY GUIDELINES

Higher Quality Guidelines are for conduct, which the Association urges members and others in the industry to comply, as they are in the interest of better serving all subscribers.

I. Guidelines to Insure High Quality Service

A. All companies are expected to use reasonable security and technological methods to provide the highest quality, uninterrupted service to subscribers consistent with the advice of counsel as to the conformance with relevant laws and regulations.

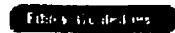
1. Members should have call center equipment redundancy and a minimum of n+1 spare component parts available.
2. Members should conform with the telecommunications standard known as "P.01"
3. Members should have a minimum of four hours of backup power in the event of a main power failure.
4. Members should have a standard data backup routine.

5. Members should have a separate physical site and equipment or an agreement of reciprocity with another service bureau to transfer calls to in the event of a cataclysmic event.
6. Members should have all systems monitored and alarmed with response 24 hours a day.

In the event that any portion(s) of these Guidelines are inconsistent with applicable law, such law shall take precedence over that portion(s) of these Guidelines.



NALA-PCA Code of Ethics



**NALA-PCA Guidelines for ALECS
and CLECS**

**2300 N Street NW
Washington, DC 20037-1128
(202) 454-7027**
