

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

Investigation by the Department of Telecommunications)
and Energy pursuant to Section 271 of the)
Telecommunications Act of 1996 into the Compliance) D.T.E. 99-271
Filing of New England Telephone and Telegraph Company)
d/b/a Bell Atlantic – Massachusetts as part of its)
Application to the Federal Communications Commission)
for entry into the in-region InterLATA (long distance)
telephone market)

**COMMENTS BY RNK, INC. ON BELL ATLANTIC – MASSACHUSETTS’
SUPPLEMENTAL COMMENTS, FILED MAY 26, 2000**

INTRODUCTION

RNK, Inc. d/b/a RNK Telecom (“RNK”) is a registered Competitive Local Exchange Carrier (ACLEC®) in the Commonwealth of Massachusetts offering residential and business telecommunications services via its own facilities, and by resale. RNK files these Comments in Response to Bell Atlantic – Massachusetts’ (“BA”) Supplemental Comments, filed May 26, 2000 (“the filing”) and accompanying “Checklist Affidavit.” Without waiving any opportunity to comment on any other or future issues in the above –referenced matter, RNK submits these comments in regard to that portion of the BA filing that pertains to Checklist Item #14, “Resale,” particularly resale billing.

RNK’s Previous Participation on This Issue

On November 23, 1999, in response to the October 25, 1999, Hearing Officer memorandum

in the above-entitled proceeding, filed the pre-technical session statement of its controller, Mr. Glenn Pokraka (“Pokraka statement”), who subsequently testified on December 9, 1999, at the Department of Telecommunications and Energy (“DTE”) technical sessions on this matter (“Pokraka testimony”).

I. TIMELINESS OF RESALE BILLING

RNK appreciates being informed of the “Connect:Direct” electronic platform to access its electronic bill. References supplied by BA to the relevant portions on the CLEC/Resale Handbooks do supply the lengthy and detailed process through which a CLEC/Reseller must go to request, install and maintain “Connect:Direct,” including incidentally purchasing software and possibly equipment, at significant expense, from BA itself. With reservations on having to pay a vendor for our own bills in order to obtain adequate billing service, RNK did inquire, as the first step of the process, of its BA Account Manager about receiving the required information to obtain Connect:Direct and Daily Usage Files (“DUF”).

While RNK was waiting for more information, RNK heard from industry sources who use or have attempted to use Connect:Direct software for billing and/or the so-called DUF transfers, that the industry has met with uneven success. RNK has also very recently confirmed its information with other industry players. Generally, the transmissions accessed through these connections have been error-ridden at the software interpretation level, precluding access to much of the needed data itself. More importantly, if nothing else, the electronic bill *data* on Connect:Direct may in fact not be consistent with all aspects of the CD-ROM versions of the electronic bills on which the CLEC/Resellers must ultimately rely as the “official version.” RNK understands that these other issues are expected to be addressed in

the next few months, and intends to pursue the Connect:Direct connection more vigorously at that time.

As for the DUF records, we have learned from the industry that the data available on the DUF, while theoretically useful in determining usage is (a) not presented in a manner consistent with the data on the bill, and (b) is not “rated” so that end user billing information can be derived without several addition steps and comparisons. As RNK believes that, when it can get a timely monthly bill in a reliable electronic version, it would have sufficient time to prepare its own ordinary bills, it chooses not to rely on or expend substantial personnel time decoding the DUF. Incidentally, we understand that DUF does not carry an *additional* expense above the substantial and recurring charges associated with the underlying Connect:Direct software and equipment itself.

Lastly, regarding billing, even if RNK were to receive the “official” electronic – CD-ROM or otherwise – bill on or after the tenth day past the closing date, we reassert our dissatisfaction that the 30-day clock for a BA billing due date starts running prior to the bill being posted (by at least ten days). Again, all of the other vendors with which we deal, including telecom carriers, date their bills when they are posted and do not require payment until thirty days after that. This “30-day” custom in this and other industries evolved because it takes even an efficient business several days on each end to process accounts receivable and payable. Any shortened timeframe on account of BA creates unnecessary and random fiscal urgencies in attending specially to BA at the expense of other business matters.

II. CLAIM ADJUSTMENTS AND CREDITS

RNK was most gratified that the December 1999 DTE technical sessions did produce a flurry of responses to outstanding claims dating back more than a year. Since then, moreover, we have found far more timely responses to our current billing claims, presumably due to BA's "re-training" of their personnel and their monthly "audits" of outstanding claims. We note that BA confirms that more than half of the outstanding claims were, by BA's own reckoning, valid. We have not yet had the resources to re-examine the claim responses received since that time, and expect that upon further information, that percentage will increase even more. We would also point out that, by our reckoning of claim responses through 1999, the *dollar amounts* of adjusted claims was on the order of 75% in RNK's favor.

RNK are also encouraged to note that, after the technical sessions, BA was able to identify a problem in its billing system as it consistently erred in a certain, apparently unique to RNK, type of charge in generating bills. That bug, as such, appears to have been remedied, although RNK also notes that of late it has requested significantly less of the service causing the errors.

Regarding the application of adjustments to the proper accounts, the billing claims report now supplied by BA has obviated the redundancy of receiving a credit and, each time, having to telephone to discern which credit for which account was applied. The billing claims report enables us now to apply the credits to the proper customer's account. Unfortunately, as many of our customers have more than one, in fact, many, lines, we still need to call to discern which claim was answered, in order to track our own claims outstanding data. BA states that it provides the credit date and amount but, as the credit

date is a random administrative date on BA's end, and the amount frequently represents a portion of a claim (or aggregated portions of individual claims within a group of claims for the same BTN) without explanation, this is of limited use in the actual reconciliation of our accounts.

Further, unfortunately, while a billing claims report on a "denied" or "partially adjusted" claim occasionally gives a hand-entered note on cause, the vast majority of denials and partial adjustments offer only a "denial code" for which BA personnel on inquiry cannot often provide an explanation. Thus, there remains an issue regarding RNK's current inability to resubmit claims and/or submit clarifying information toward fair and accurate final disposition of unresolved claims.

III. BILLING INACCURACIES AND ERRORS

As we reported to the Department at the time of the technical sessions, there have been patterns of billing errors such as the above-mentioned "unique-to-RNK" type of service billing, since resolved. Since that time, three more glitches in BA's billing system have come to our attention and detriment. First, for the last several months, calls associated with an RNK customer's bill but originate elsewhere, presumably – after manual research to obtain this much information -- "collect calls," generate an error message in the software interpretation of the BA bills. To date, after inquiry to BA (on each of these instant matters, of course), RNK is still unable to generate customer billing for collect calls to our customers, although we continue to pay BA for those calls. Second, also several months ago, a similar problem arose with the additional minutes to be billed customers beyond their "flat rate" Bay State East calling plans. Something in the BA billing coding changed and we were unable to "rate" or sort out for billing, any additional customer usage beyond their flat rate plan. Again, we cannot bill our customers

accurately, so we cannot bill them; yet we continue to pay BA. Despite inquiry, they cannot provide further information on this problem, nor information for our software support personnel to attempt to override the problem in our own data management.

Most recently, BA again appears to have changed the coding of their billing system without notice or explanation and have thus rendered random errors across Billing Telephone Numbers ("BTN") and across calling plans. Their billing software now randomly assigns calls an "inclusion indicator" ("0" or "1") which randomly designates the call or group of calls as being either included, or not, in the customers' calling plans. We now have no way of knowing which calls from which customers are or are not within their calling plans, for *all* of our customers who have local calling plans with detailed call records. Thus we cannot bill any customers whose calls are wrongly designated as being within their plans, and we cannot know whether those appearing to have only charges within their plan truly only do. Although the data is there, our software cannot read it because of an error in this 'designation' field. Further, we would have no realistic way of gleaning the data manually, even if we had the time, because, as it is, our software does not flag – just skips over--- the erroneous entries. BA projects it may have this remedied by August, by which time we will not have billed these customers for several months.

CONCLUSION

While BA has made improvements in several areas, other problems remain and new problems have arisen. In summary, RNK hopes that Bell Atlantic will continue to remedy these problems as it has

others, and hopes that the Department will continue to review thoroughly all compliance filings.

For RNK,

By its attorney,

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