

Flynn Affidavit – Attachment A

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Application by SBC Communications Inc.,)
Pacific Bell Telephone Company, and) WC Docket No. 02-____
Southwestern Bell Communications Services,)
Inc. for Provision of In-Region,)
InterLATA Services in California)

AFFIDAVIT OF MICHAEL E. FLYNN

AFFIDAVIT REGARDING BILLING

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I, Michael E. Flynn, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION AND QUALIFICATIONS

1. My name is Michael E. Flynn. I am Director-Billing Project Management for SBC Services supporting Pacific Bell Telephone Company (“Pacific”) and Nevada Bell Telephone Company (“Nevada”). My business address is 2600 Camino Ramon, 4W355, San Ramon, California. I am responsible for billing system project management to support billing to Competitive Local Exchange Carriers (“CLECs”) in the wholesale environment.
2. I graduated from California State University, Hayward in 1987 with a Bachelor’s degree in Finance. I have over 20 years of telecommunications experience with Pacific and SBC Communications Inc. I have held numerous management positions throughout my career in Operator Services, Network Services, Network Planning, and Engineering and Billing, five years of which have been associated with Local Wholesale Billing.

PURPOSE OF AFFIDAVIT

3. The purpose of my affidavit is to demonstrate that Pacific satisfies its obligations to provide CLECs non-discriminatory access to Operational Support System (“OSS”) billing functionality in accordance with the requirements of the Telecommunications Act of 1996, and with FCC and California Public Utilities Commission requirements.

BILLING SYSTEMS

4. Pacific uses the Customer Record Information System (“CRIS”) to bill residential and business customers for retail products, and to bill CLECs who are reselling Pacific’s products and services. On a monthly basis, the CRIS system processes over 5 billion usage records and currently creates approximately 12 million bills that are issued to Retail and Wholesale customers.¹

5. In 1996, Pacific’s Carrier Access Billing System (“CABS”) was modified for use by Pacific’s wholesale operations to bill CLECs for Unbundled Network Elements (“UNE”) and Interconnection products, including loops, switch ports, loop and port combinations, local transport and interconnection. Billing for these elements includes monthly recurring charges, non-recurring charges, and usage-sensitive charges as appropriate. Through its CABS system, Pacific currently processes more than 2.7 billion CLEC usage records a year, and creates over 3000 monthly CLEC bills.²

BILLING PROCESSES

6. There are four major functions in CABS and CRIS billing systems that are related to CLEC billing: Service Order Processing, Usage Processing, Bill Preparation and Daily Usage File.

7. **Service Order Processing.** Customer billing account information is established and changed in the CRIS and CABS billing systems via service order activity. As service orders are processed, billing elements for products and services on the service order are

¹ Pacific and Nevada utilize the same billing systems. Consequently, all billing system volumes provided in this affidavit include both Pacific and Nevada totals.

² The Flexible Automated Billing System (“FABS”) is used by Pacific to bill miscellaneous charges to Pacific retail customers, affiliates, Interexchange Carriers (“IXCs”) and CLECs. Miscellaneous charges include such items as Special Service and Equipment Contracts for large retail customers, and other items that are not generally telephone number or circuit number driven. FABS currently produces approximately 10,000 paper bills per month, less than 1% of the total monthly bills produced by Pacific.

edited for accuracy and completeness. The service order billing elements are then rated and updated to the customers' billing accounts. All CLEC customers billing information is stored in the billing account master file.

8. **Usage Processing.** Call detail is recorded at Pacific's central office switch in Automated Message Accounting ("AMA") format. These call detail records are collected and sent to Billing for bill processing. All billable messages are edited, rated and guided to each customer's usage account. This usage data is stored in the usage master file awaiting Bill Preparation.
9. **Bill Preparation.** This process aggregates all service order activity and usage collected over the previous month and creates a bill for delivery. Billing may be delivered to CLECs via paper, Magnetic Tape or electronic transmission. In addition, Resale billing is offered to CLECs in CD-ROM format and EDI 811 electronic transmission. Bill Media is discussed in further detail below.
10. **Daily Usage File ("DUF").**³ Pacific provides CLECs with usage records (including end user, access and interconnection records as appropriate) formatted using the EMI industry standard, enabling CLECs to (1) bill their end user customers, (2) bill interconnecting carriers, and (3) reconcile their wholesale bills. CLECs may elect to have their DUF delivered electronically, or via Magnetic Tape, and have the option of receiving their DUF file on a daily, weekly or monthly basis. Approximately 2.6 billion usage records are delivered by Pacific and Nevada to CLECs on a yearly basis through the DUF process.

³ Also commonly referred to as "usage extract" or "data exchange."

BILLING IMPLEMENTATION

11. Rates are maintained in billing rate files within the CRIS and CABS applications. Changes to rates caused by regulatory rulings that are universally applicable, or that result from contract renegotiations or arbitrations, are normally implemented within 30 to 120 days from receipt of the change. Development of new products or changes to rate structures (e.g., implementation of zone pricing) are accomplished through system changes that normally require a full software development life cycle of approximately six months from the receipt of the billing requirements. When Pacific is unable to immediately assign wholesale prices in accordance with an interconnection agreement, the CLEC is provided service, even if billing is delayed until the required system changes have been made. Once system changes are implemented, an adjustment is made per the terms and conditions of the CLEC's interconnection agreement.

BILLING DATES

12. CLECs are billed monthly by Pacific for the products and services purchased. This billing includes monthly recurring charges, non-recurring charges and usage charges. CLECs providing UNE and Interconnection products may select one or more of three CABS bill dates, the 1st, 14th and 26th. Retail subscribers and CLECs providing service via resale are billed on one or more of the 19 available CRIS bill dates. Pacific's Resale Select Bill Date product allows Resale CLECs to minimize billing costs by consolidating their new or existing bill dates to one bill date per region, one North and one South.

BILL MEDIA

13. CLECs can choose to receive their CABS bills in paper format or in electronic media. Pacific's Billing Data Tape ("BDT") follows the industry standard Billing Output

Specification (“BOS”) guidelines. The BDT provides the same information contained on the CLEC’s paper bill. CLECs receive the BDT via CONNECT: Direct™ or via Magnetic Tape.

14. CLECs providing resold services can elect to receive their CRIS bills in paper format or in electronic media, via EDI 811 electronic transmission, CD-ROM, or Magnetic Tape. The EDI 811 follows industry standard guidelines. The CD-ROM and Magnetic Tape formats use the same proprietary format that Pacific uses for the electronic bills it provides to retail customers.

BILLING PERFORMANCE MEASURES

15. Performance for the billing processes and systems described above is measured and reported through a comprehensive set of measurements. In the May 2002 through July 2002, Pacific has successfully met or exceeded its billing performance objectives, meeting 100% of its billing submeasures in two of the last three months.⁴

CALIFORNIA OSS TEST

16. As part of the California OSS Test, Cap Gemini assessed the accuracy and timeliness of wholesale bills, usage data and billing records produced by the CABS system.⁵ Cap Gemini found that:

- The bill complied with detail and format as indicated in the Telcordia CABS Billing Output Specifications.
- The usage complied with detail and format as indicated in the Ordering and Billing Forum (“OBF”) guidelines for the EMR format.

⁴ See the Affidavit of Gwen Johnson (App. A, Tab 12) for specific information concerning billing performance for CLECs as assessed in performance measures 28 (Usage Timeliness), 30 (Wholesale Bill Timeliness), 31 (Usage Completeness), 32 (Recurring Charge Completeness), 33 (Non-Recurring Charge Completeness), 34 (Bill Accuracy) and 35 (Timeliness of Billing Completion Notices).

⁵ The California OSS test is discussed in detail in the Joint Affidavit of Stephen D. Huston and Beth Lawson (App. A, Tab 11).

- The rates were applied correctly for each product, service or element.
- Surcharges were applied appropriately for the jurisdiction.
- Products billed in advance as well as recurring and non-recurring charges were billed accurately.
- Discounts, adjustments and calculations were performed appropriately.
- Rounding rules were applied accurately.
- Prorated amounts were charged accurately according to the disconnect date.
- What was ordered was what was billed.
- Disconnects were processed and appeared accurately on the bill.

The bills (hard and electronic copies) and usage feeds were received in a timely manner.⁶

17. The final result of the OSS test established that Pacific's CABS system provides CLECs with accurate and timely electronic and paper bills.⁷
18. "Pursuant to Part II. E of the Consent Decree entered into between SBC Communications Inc. and the Federal Communications Commission, released on May 28, 2002, see Order, In the Matter of SBC Communications, Inc., 17 FCC Rcd. 10780 (2002), I hereby affirm that I have (1) received the training SBC is obligated to provide to all SBC FCC Representatives; (2) reviewed and understand the SBC Compliance Guidelines; (3) signed an acknowledgment of my training and review and understanding of the Guidelines; (3) signed an acknowledgment of my training and review and understanding

⁶ See Section 3.1.4 of the TAM Final Report, Version 1.2 (Feb. 12, 2001) (App. D, Tab 212).

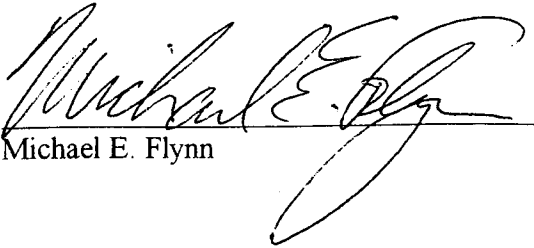
⁷ In making this finding, Cap Gemini noted 2 billing exceptions, both of which were addressed and closed during workshops held by the CPUC. See Pacific OSS Test Recommendation Verification Report Version 1.0 (June 22, 2001), Section 2 – 2.2.6, pp.16 – 19 (App. D, Tab 227).

of the Guidelines; and (4) complied with the requirements of the SBC Compliance Guidelines.”

This concludes my affidavit.

STATE OF California)
)
COUNTY OF Contra Costa)

I declare under penalty of perjury that the foregoing is true and correct.


Michael E. Flynn

Subscribed and sworn to before me this 13th day of Sept, 2002


Notary Public

