

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

A. GENERAL

At the request of a customer, the Telephone Company upon reasonable notice and with reasonable effort, will provide Billing Analysis Service for subject line identification, detection, investigation and deterrence of billing evasion activities.

The term "billing evasion activities" used herein denotes Message Billing Abuse and/or Network Abuse. Such abuse is the use of an access line (e.g., end user line or trunk, pay telephone line or other access line or trunk provided by the Telephone Company) where there is intent to circumvent or evade the proper charges in whole or in part for use of telecommunications services over the access line, or to conceal the points of origin or termination of telecommunications services.

Such activities include bypass or circumvention of Telephone Company and/or customer billing equipment, unauthorized use of Telephone Company and customer service offerings, and unauthorized use of Telephone Company facilities.

General Description

Subject line identification is a procedure to identify a telephone line suspected of originating fraudulent activity on a customer's (Interexchange Carrier's) network to evade billing responsibility. Subject line identification is available only in ESS offices equipped to provide call trace information to identify the telephone number originating suspicious calling patterns. Further investigation may be requested e.g., Documentation Scan.

Detection is the provision of equipment by the Telephone Company to identify and collect information on network abuse and/or message billing abuse. Such equipment may be located in Telephone Company premises or offices or may be attached to access lines.

Investigation is the provision of investigative services to collect evidence to document that billing evasion activities are occurring, prepare reports, preserve evidence and supply expert witness analysis and testimony. Investigation also includes provision of services to coordinate the investigative activities between Exchange Telephone Companies and/or law enforcement agencies.

Deterrence is the contacting and interviewing of parties identified in billing evasion activities, supplying deterrent literature, educational programs and publicity assistance in publicizing billing evasion deterrence.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS

1. Undertaking of the Telephone Company

- a. When Billing Analysis Service is ordered under a Special Order by an authorized security representative of the customer, the Telephone Company will provide any one or all of the services as set forth in b. through f. following at rates and charges as set forth in C. following.

b. Detection Service

- (1) Network Abuse Detection Service will be provided at any central office switch equipped to recognize and record irregular key pulse and multifrequency signals upon receipt of a special order from a customer specifying the central office(s) where detection service is requested.
- (a) Reports of detection service results will be provided on an office-by-office basis at the request of the authorized security representative of the customer. In offices equipped with the SIGI (Signaling Irregularity Detection Circuit) feature, there is a continuous scan for current signal irregularities. A weekly report of any signaling irregularities will be furnished for any of these offices. In offices without the SIGI feature, detection of signal irregularities can be provided utilizing portable equipment, if available. This service will provide reports of signaling irregularities on toll access trunks for the previous 30 days (30-day report).
- (b) The detection service reports as set forth in (a) preceding will include, for a signaling irregularity observed, the following if available: 1) the calling NPA and telephone number (i.e., NXX-XXXX), 2) the called number (i.e., NPA and telephone number recorded by Telephone Company billing equipment, 3) signaling irregularity data, 4) the holding time of the call, and 5) the date of the call. The report will be provided as a paper printout or microfiche at the discretion of the Telephone Company, and sent to the authorized security representative of the customer by registered first class U.S. Mail service. However, an authorized security representative of the customer may pick up the report at a location designated by the Telephone Company. The 30-day report will be analyzed on not less than a weekly basis and will be available for mailing or pickup 2

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

1. Undertaking of the Telephone Company (Cont'd)

b. Detection Service (Cont'd)

(1) (Cont'd)

(b) (Cont'd)

weeks after the end of the 30-day period. Results of the continuous scan will be provided to the authorized security representative of the customer by a written report and/or a telephonic report within six working days after the end of a weekly scan.

(c) A detection and documentation scan per line will be provided when an authorized security representative of the customer provides a written request for such a scan. This request must include the nature of the suspected billing evasion activities and any evidence supporting the case. The maximum duration of this scan shall not exceed 30 days. The Telephone Company reserves the right to deny this service in cases where in its judgment "probable cause" does not exist. The Telephone Company will notify the customer if there is reason to suspect billing evasion. Specific scan documents and any associated source material will not be provided until the Telephone Company is requested to do so by subpoena or lawful demands.

(d) Specific scan details as set forth in (c) preceding will include if available:

- (1) Calling NPA - NXX-XXXX
- (2) The number of calls frequently made from the calling number
- (3) The period of time scan
- (4) The authorization code if applicable
- (5) Called NPA - NXX-XXXX
- (6) Indications of type of fraud methods used
- (7) Holding time of calls
- (8) Date and time of calls

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

1. Undertaking of the Telephone Company (Cont'd)

b. Detection Service (Cont'd)

(2) Message Billing Abuse

(a) Detection and documentation scan for Message Billing Abuse will be provided as described in (1)(c) above.

(b) Results of detection and documentation scan for Message Billing Abuse will be provided as described in (1)(d) above.

(3) Analysis of Data/Subject Identification

This element shall apply to the analysis of data/subject location identification of suspected billing evasion activities.

c. Investigative Service will be provided by authorized Telephone Company Security personnel upon receipt of a Special Order from an authorized security representative of the customer specifying the line or lines or billing evasion activity (i.e., message billing abuse and/or network abuse) to be investigated. The services provided include the provision of an identification report, collection of evidence, provision of a detection and documentation scan, preparation of an affidavit and prosecutive summary, preservation of evidence collected, assistance to law enforcement agencies and provision of expert witness analysis and/or testimony, the coordination of billing evasion investigative services and arrangement for restitution as appropriate.

(1) Provision of suspect identification information is the collection by Telephone Company personnel of billing information, party name, party address, service configuration, if applicable, and the oral presentation of this information to the authorized security representative of the customer.

(2) Collection of evidence is the gathering of information or data pertinent to billing evasion activity specified by the authorized security representative of the customer. Collection of this evidence includes but is not limited to the contacting and interviewing of suspects/witnesses associated with the billing evasion activity.

(3) Preparation of an affidavit and prosecutive summary is the written documentation of the evidence collected by the Telephone Company personnel who performed such activities.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

1. Undertaking of the Telephone Company (Cont'd)

c. (Cont'd)

- (4) Preservation of evidence is the placement of the collected evidence in a secure location under the control of Telephone Company Security for a period of up to two years. Such preservation of evidence will be continued beyond two years by the Telephone Company when mandated by law, requested by appropriate law enforcement agencies or the authorized security representative of the customer.
- (5) Assistance to law enforcement is the accompanying of duly authorized law enforcement personnel to a location where billing evasion activities have been determined to exist in order to identify billing evasion activity devices or materials. The Telephone Company personnel will provide such assistance to law enforcement personnel only after law enforcement involvement has been approved by the customer, or under services as set forth in (9) following. If such assistance is required at locations outside the operating territory of the Telephone Company involved, any out of pocket payments for travel and/or other expenses of Telephone Company personnel will be billed to the customer, except to the extent that such expenses are paid by the judicial system.
- (6) Provision of expert witness analysis is the review, study and other technical support activities provided by Telephone Company experts to analyze and/or document whether devices and materials associated with an investigation furnished by the authorized security representative of the customer, collected for an investigation by the Telephone Company or under services as set forth in (9) following, operate, perform or contain billing evasion activities. A written analysis report will be provided upon request to the authorized security representative of the customer. The expert will be selected by the Telephone Company.
- (7) Provision of expert witness testimony is the preparation of testimony and the submission of such testimony in association with an investigation. The expert witness will be selected by the Telephone Company.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

1. Undertaking of the Telephone Company (Cont'd)

c. (Cont'd)

- (8) Coordination of billing evasion investigative services between Telephone Companies is the referral of investigative information to other Telephone Company security personnel, provision of billing evasion information to other Telephone Company security personnel, the collection of information from other Telephone Company security personnel, and the tracking, collecting and reporting of the results of such investigations to the authorized security representative of the customer.
- (9) Coordination of billing evasion investigative activities of participating law enforcement agencies is the provision of billing evasion information to the law enforcement agencies, the collection of billing evasion information from the law enforcement agencies and the tracking, collecting and reporting of the results of such participation to the authorized security representative of the customer. This coordination will be provided only upon receipt of written authorization from the authorized security representative of the customer. Legal process may be required to comply with the above.
- (10) Any out of pocket payments for travel and/or other expenses of Telephone Company personnel will be billed to the customer, except to the extent that such expenses are paid by the judicial system.

- d. Deterrence services will be provided at any location in the operating territory of the Telephone Company that Telephone Company security personnel can safely and legally enter. Deterrence services will be provided, at the written request of the authorized security representative of the customer. Telephone notice may initiate the provision of service if written authorization is forthcoming. Deterrence services will be provided by the Telephone Company when billing evasion activity is found to warrant such actions. Deterrence service includes the contacting and interviewing of parties identified by the Telephone Company as being involved in billing evasion activities, supplying deterrent literature, educational programs, publicity assistance for publicizing billing evasion activity deterrence, and review of customer billing evasion deterrence control programs.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

1. Undertaking of the Telephone Company (Cont'd)

d. (Cont'd)

- (1) Contacting and interviewing of parties is the written or verbal notification to, or a face-to-face discussion with, a party or parties by Telephone Company security personnel in order to deter further billing evasion activities. Contacting and interviewing is provided at locations identified by law enforcement agencies, the customer or the Telephone Company.
- (2) Publicity assistance is the provision of information and personnel to aid in publicizing billing evasion activity deterrence. The disseminated information will be mutually agreed upon by the Telephone Company and the customer. The Telephone Company will select the personnel and media, if any, to provide this service.
- (3) Review of customer billing evasion deterrence control programs and related activities is advice to and/or training of customer personnel on billing evasion deterrence and preventive controls and the development of billing evasion deterrence and preventive control programs for the customer.
- (4) Any out of pocket payments for travel and/or other expenses of Telephone Company personnel will be billed to the customer, except to the extent that such expenses are paid by the judicial system.

e. The Telephone Company will, at the request of the customer, provide analysis of data/subject identification, investigative and deterrent service on a premium time basis. When such services are provided on a premium time basis, the premium time charges as set forth in C. following apply.

f. Subject Line Identification

- (1) The Telephone Company will provide subject line identification upon verbal request from an authorized representative of the customer to an authorized Telephone Company security representative subject to available personnel and equipment. Such verbal request must contain sufficient detail for the Telephone Company to initiate an investigation.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

1. Undertaking of the Telephone Company (Cont'd)

f. Subject Line Identification (Cont'd)

- (2) The Telephone Company will terminate a subject line identification if it is determined that the call has been identified as originating through a customer who is another Interexchange Carrier, or if definitive results cannot be obtained in one hour. The charges specified in C. following apply in all such cases.
- (3) The Telephone Company will normally process and complete each subject line identification request within three hours after the request is made.
- (4) The Telephone Company will provide a verbal confirmation of the results of each subject line identification request to the authorized representative of the customer no later than the business day following the day such request is made.
- (5) Upon receipt of a Subject Line Identification Request Form from the customer verifying the verbal request, the Telephone Company will furnish written confirmation of the Subject Line Identification results.

2. Obligations of the Customer

- a. The authorized security representative of the customer, except as specified in k. following, shall order all Billing Analysis Services the customer wishes to receive under a Special Order. A Special Order is used to establish or change the service.

When Billing Analysis Service is initially ordered, the customer may order the service on a Case by Case Basis or on a yearly basis with a predetermined level of activity per month for Investigative/Deterrence service. The minimum predetermined level of activity per month for Investigative/Deterrence service is forty-eight (48) hours.

When the customer orders Billing Analysis Service on a yearly basis, the customer must furnish the Telephone Company with the designated minimum level of activity they wish to purchase, as shown in C.2.b. following. Not later than six months prior to the end of the order period the customer shall notify the Telephone Company in writing if the service is to be discontinued or modified at the end of the period. If notice is not received from the customer, the Telephone Company will automatically extend the service for another year, using the most recent minimum level of activity purchased, at the rates specified in C.2.b. The customer will be notified by the Telephone Company when such an extension is made.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

2. Obligations of the Customer (Cont'd)

- b. With each order, the customer shall designate and identify the authorized security representative who will be responsible to protect the information and to whom the Billing Analysis Service information will be provided. The customer shall assure and take every effort to make sure the Billing Analysis Service information is provided to and used only by authorized personnel involved in billing evasion activity matters.
- c. When Billing Analysis Service Investigation is ordered, the authorized security representative of the customer shall furnish all known details of the billing evasion activities, including the access lines, parties or messages to be investigated, and shall furnish all necessary end user information they possess to the Telephone Company security personnel. Such known details shall be sufficient to reasonably warrant a Billing Analysis Service investigation by the Telephone Company. The specification of the access line, party or message to be investigated shall be in writing by the authorized security representative of the customer.
- d. When law enforcement agencies are to be brought into the investigation, the authorized security representative of the customer shall secure their participation or authorize the Telephone Company in writing to obtain and coordinate such law enforcement agency participation.
- e. When evidence collected by the Telephone Company is to be produced in connection with a judicial proceeding, the customer shall notify the Telephone Company of such a requirement in a timely manner.
- f. All inquiries from the customer's end user concerning services provided under this tariff are to be handled by the customer. Any questions to the Telephone Company shall be made by the authorized security representative of the customer.
- g. Except as set forth in 1.d.(2) preceding, publicizing of actions resulting from services provided under this tariff shall be the responsibility of the customer. The customer shall not publicize that the Telephone Company assisted the customer unless the customer has written permission to do so from the Telephone Company.
- h. When the authorized security representative of the customer orders, with probable cause as determined by the Telephone Company, detection service or a detection and documentation scan of an individual line, it shall specify in writing the offices, lines or parties to be included in the scanning and reports the Telephone Company will provide.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

2. Obligations of the Customer (Cont'd)

- i. When provision of expert witness analysis is ordered by the customer, the customer shall be responsible for furnishing the evidence to be analyzed unless the services as set forth in 1.c.(9) preceding are ordered by the customer.
- j. When provision of expert witness testimony is ordered by the customer, the customer shall include the name, if any, of the Telephone Company expert desired and when and where the testimony is needed.
- k. The customer will provide a list of customer representatives other than authorized security representatives having the authority to make subject line identification requests.
- l. When subject line identification is requested by the customer, a completed Subject Line Identification Request Form, including the customer's evidence for suspecting billing evasion activities, will be transmitted to the Telephone Company within two business days following such verbal request.

3. Payment Arrangements

a. Minimum Periods and Minimum Charges

The minimum period for which Billing Analysis detection service continuous scanning is provided and for which charges apply is one month.

The minimum period for Billing Analysis Service for customers who subscribe to a predetermined level of activity per month shall be twelve (12) months.

The minimum monthly charges for customers who subscribe to a predetermined level of activity per month will be based on the level of activity ordered as described in C.2.b. following.

If service is discontinued prior to the end of the period ordered, the monthly charges will apply for the remaining months.

b. Cancellation of A Special Order

A customer may cancel a Special Order for Billing Analysis Service on any date prior to the service date. The cancellation date is the date the Telephone Company receives written or verbal notice from the authorized security representative of the customer that the Special

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

3. Payment Arrangements (Cont'd)

b. Cancellation of A Special Order (Cont'd)

Order is to be cancelled. The order date is defined as the date the verbal notice is received. The verbal notice must be followed by written confirmation within 10 days. The service date for Billing Analysis Service is the date the Telephone Company and the customer mutually agree the service is to start.

When a customer cancels a Special Order for Billing Analysis Service after the order date but prior to the start of service, a charge as listed following shall apply.

- (1) For detection service, the per-report charge for each 30-day report ordered, the per-month charge for each office where a continuous scan is ordered and the per-occurrence charge for each documentation detection ordered.
- (2) For investigative service, two times the appropriate hourly charge for the service ordered.
- (3) For deterrence service, two times the appropriate hourly charge for the service ordered.

c. Changes to Special Orders

Customer requested changes to a pending Special Order for Billing Analysis Service will be undertaken if they can be accommodated by the Telephone Company. However, all changes to pending orders for detection service will be considered as a discontinuance of the pending order and the placement of a new order and appropriate charges will apply. Any additional time required on the part of the Telephone Company personnel will be billed to the customer at the appropriate hourly charges.

4. Rate Regulations

- a. The charge per report for the 30-day report, as set forth in C.1. following, applies for each report provided to a customer even though no signaling irregularities are found.
- b. The charge per office per month for continuous scan as set forth in C.1. following applies for each month of service even though no signaling irregularities are found.

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

B. REGULATIONS (Cont'd)

3. Payment Arrangements (Cont'd)

- c. The per-hour rate for analysis of data, investigative service and/or deterrence service is for the use of one hour of one Telephone Company security person's time.

The customer may order a predetermined level of activity they will purchase each month as specified in C.2.6. following. The predetermined level of activity will reflect a total of Investigative/Deterrence hours. The purchase of a predetermined level of activity entitles the customer to purchase any amount of Analysis of Data/Subject Identification at the rate associated with the level of activity ordered for Investigative/Deterrence service as specified in C.2.6. following. The predetermined level of activity purchased will determine the hourly charges for all hours incurred. If the customer does not subscribe to a predetermined level of activity, the customer will be billed the Case by Case hourly rate.

A minimum payment will be applicable when the actual level of activity is less than the predetermined monthly level. The minimum payment will equal the customer's predetermined minimum hours times the corresponding Investigative/Deterrence rate as specified in C.

- d. The Telephone Company will keep a count of the hours and fraction thereof used by Telephone Company personnel to provide Investigative/Deterrence service and Analysis of Data/Subject Identification service separately and will bill the customer in accordance with these records. The hours for each service ordered will be summed and then rounded to the nearest hour, except that when the total is less than one hour, one hour will be used to determine charges.
- e. Premium time is for all hours of work performed outside the Telephone Company's normal work schedule and/or which requires additions to the work force.
- f. The Billing Analysis Service Special Order Charge applies for each Special Order accepted by the Telephone Company to establish or change any Billing Analysis Service.

ACCESS SERVICE TARIFF
P.S.C.-Md.-No. 217

Verizon Maryland LLC

Section 8C
Original Page 13

BILLING AND COLLECTION SERVICES -
BILLING ANALYSIS SERVICES

C. RATES

1. Detection Service	Nonrecurring				USOC
	Charges				
30-Day Report per office, per report.....	\$1,500.00				HENRX
Continuous Scan per office (SIGI), per month scanned.....	150.00				HENGX
Documentation Scan, per line.....	500.00				HENBX
Analysis of Data/Subject Identification, Case by Case, per hour* of analysis....	85.00				HENHN
2. Investigative/Deterrence Service					HENJN
a. Case by Case, per hour*.....	115.00				HENJP
b. Predetermined Activity Time	Per Month				
	Per Hour Band				
Investigative/Deterrence	48-143	144-287	288-574	575-764	765
Service, per hour*†	\$114.00	\$113.00	\$111.00	\$108.00	\$105.00 (U)
Analysis of Data/Subject Identification, per hour, per Preselected Band	84.00	83.00	81.00	78.00	75.00 (U)
	Nonrecurring				
	Charge				
3. Special Order.....	\$20.00				ZOCBA
4. Subject Line Identification					
The rate per subject line identification request is as follows:					
Monday - Friday except Holidays					
(8:00 a.m. - 4:30 p.m.)	\$243.00				HENGHN
(Other hours)	425.00				HENGPP
Weekends and Holidays					
(24 hours)	425.00				HENGPP

* Premium time rates are two times the per hour rate.

† Must order minimum of 48 hours.

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