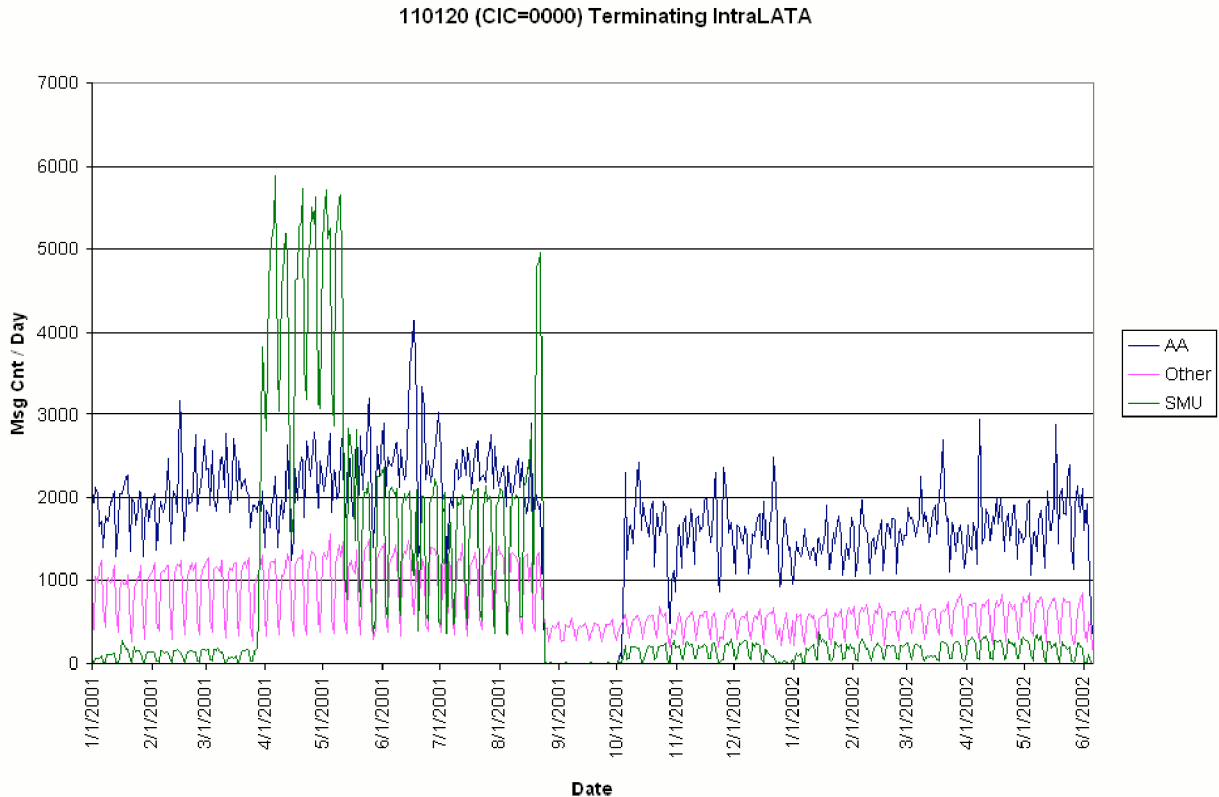


How SBC Diverts and Often Even Bills YOUR CDRs

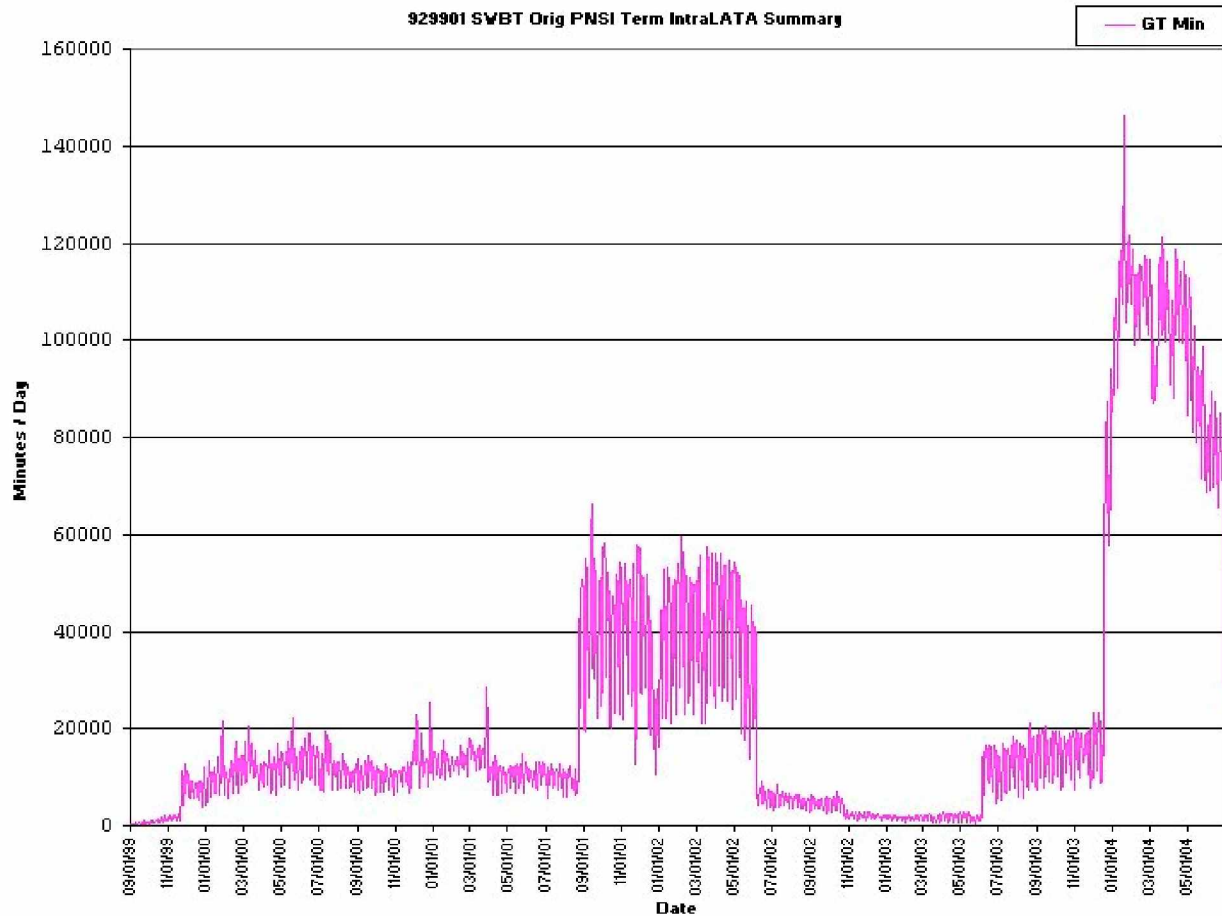
The charts below are actual examples of CLEC call detail records (CDR) lost, diverted, or billed by SBC. This particular CLEC caught SBC numerous times in four year and collected seven figures in CDR settlements. The charts below will give you an idea of the kinds of problems found and how the CLEC was able to spot them.



1. The chart above is 110120 terminating INTRA LATA traffic. The green line is terminating INTRA LATA traffic for a large university customer, the blue line is a large airline customer, and the red line is everybody else. In the case of the large university, the CLEC had all 10,000 numbers in the exchange (0000 through 9999) which provided some unique visibility. Note that from 1/1/01 through 4/1/01, the SBC data reported that the 5,500 students at this university only received about 200 terminating intra Lata calls a day. Finding this an impossible figure we filed a challenge to SBC. The result was the huge spike in traffic in April 01 shown above and a six figure financial settlement. The story however, goes on.

1. Note that the traffic drops in half in mid-May 2001. No problem. Summer Break.
2. The traffic came back with the students in late August as the green line above shows - for about three days. Then as you can see, ALL traffic (except for a trickle of small customers) vanished on 8/28/01. What happened? The short answer is that SBC implemented a software change. The net result of this software change was to turn CLEC records into SBC records. Few CLECs complained. (Check your data - other CLECs note this same pattern!)
3. After we complained, SBC claimed they fixed the problem on 10/9/01 - but look at the fix! The green line (university) is back to 200 calls a day. The blue line (airline) dropped by 1/3. The red line (all other customers) dropped by 2/3. Yet SBC claimed everything was fixed.

The story goes on some more with the chart below:



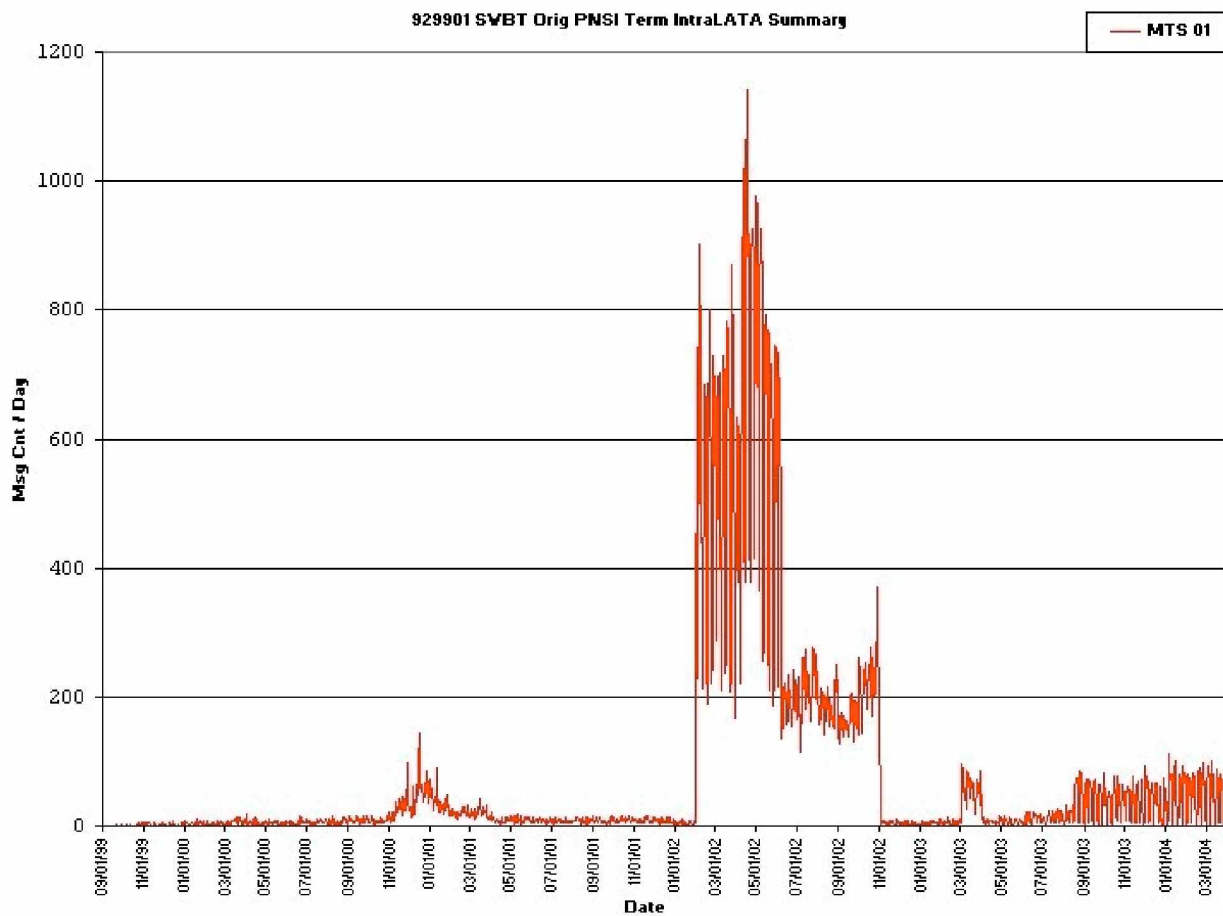
This chart shows INTRA LATA records, but not only terminating records like the one above, it shows ALL records reported according to the data SBC provided to the CLEC. Note the unexplainable pattern:

1. The same day the "big gap" in the first chart showed up, 8/28/01, the records in THIS chart switched on! The net effect to the CLEC was the loss of its "premium" CABS traffic and in its place, a bunch of local "junk" records. Since this CLEC was "bill and keep" SBC could bill for the additional records at the same time it kept the CLEC's CABS records and billed them as well.
2. In June 2002, SBC mysteriously lost 95% of this CLECs call detail records. When queried, SBC stated that the CLEC's customers just stopped calling.
3. In the Spring of 2003, the CLEC began filing complaints with the Public Utility Commission of Texas. In June 2003, a large portion of these records mysteriously came back as the chart above shows. Coincidence? Not exactly. It was at this time that SBC began assigning special teams at the Local Service Center (LSC) to "correct usage" on thousands of this CLEC's orders which had never been properly installed. One SBC employee, Renee Dodd, was involved in this project and describes it in her letter to the FCC which can be downloaded from this web site. (We had to get it through a Federal Freedom of Information Act Request)
4. In late December 2003, a huge spike in this CLEC's records took place as the chart above shows. SBC tripled their usage bill to the CLEC to reflect this usage but claimed that there was no CABS traffic due to the CLEC because it was all local. Even so, the CABS bills from this CLEC to the IXCs increased by 30% in January 2004 and stayed at that level throughout 2004.
5. The CLEC currently has a federal suit pending against SBC where this information, and more like it will be presented. Note that ALL charts above were compiled using SBC data.

Preliminary Conclusions

1. SBC OSS problems in billing and order posting are directly related to the call detail records loss issue. In essence, the dysfunctional SBC order process never installs the triggers, updates the file guides, and god knows what else. All three SBC problems (accidental disconnection on conversion, overbilling and CDR loss) therefore have a common root cause in the SBC OSS.
2. CABS and Type 92 Records have common parentage and both can be potentially affected by the same SBC programming apparatus. Switches create AMA records, which become EMI (CABS) records. Some CABS records go on to become Type 92 records, some do not. Every Type 92 record is originally rooted in an EMI / CABS record. The same things that affect CABS records (like triggers and file guides) also can affect Type 92 records. TelLAWCom Labs Inc. believes the whole record recording process for CLECs is in serious trouble for reasons below: Some additional examples of typical SBC records losses are show in the charts below.

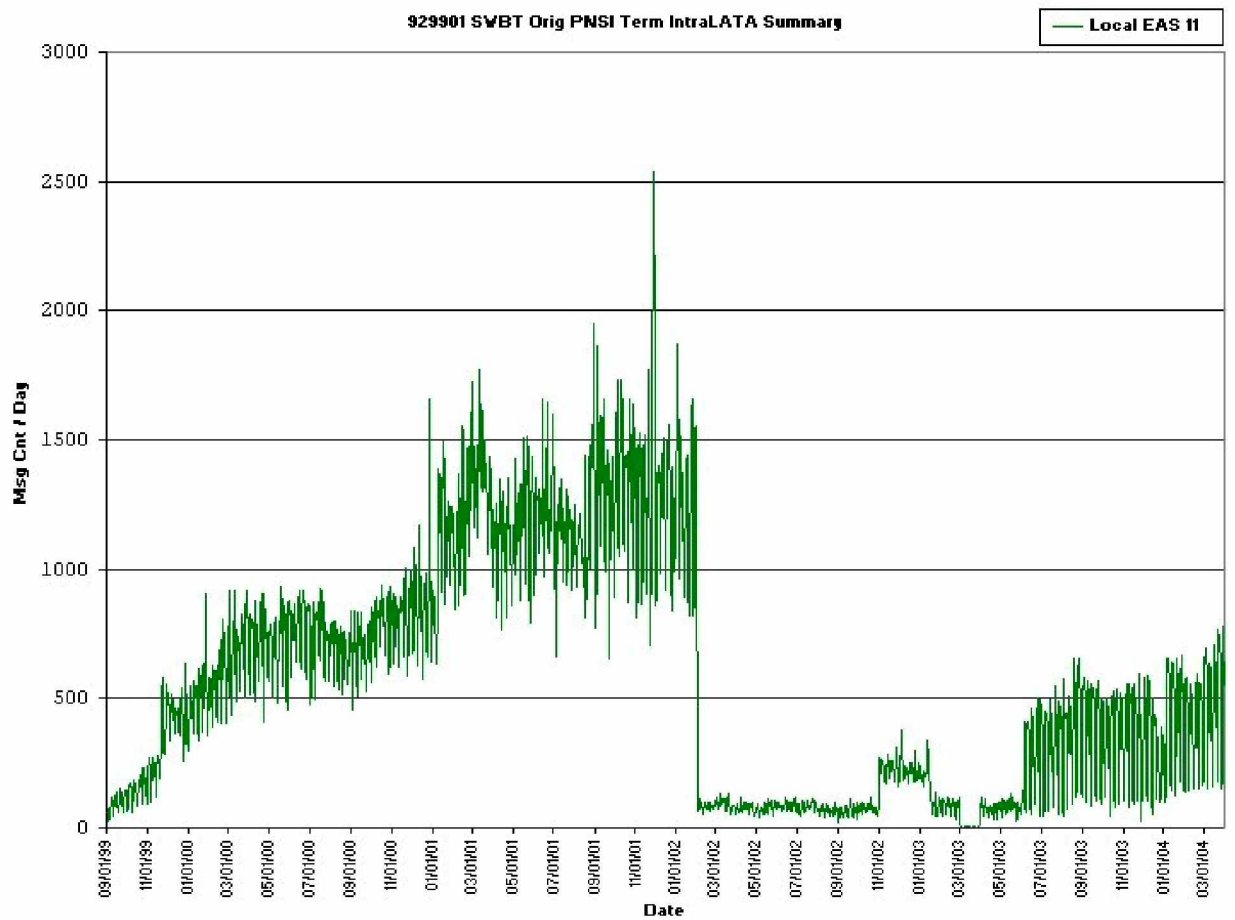
929901 SWBT Orig PNSI Term IntraLATA Summary (MTS 01)



The diagram above illustrates suspicious patterns MTS toll traffic based SBC-provided summary records.

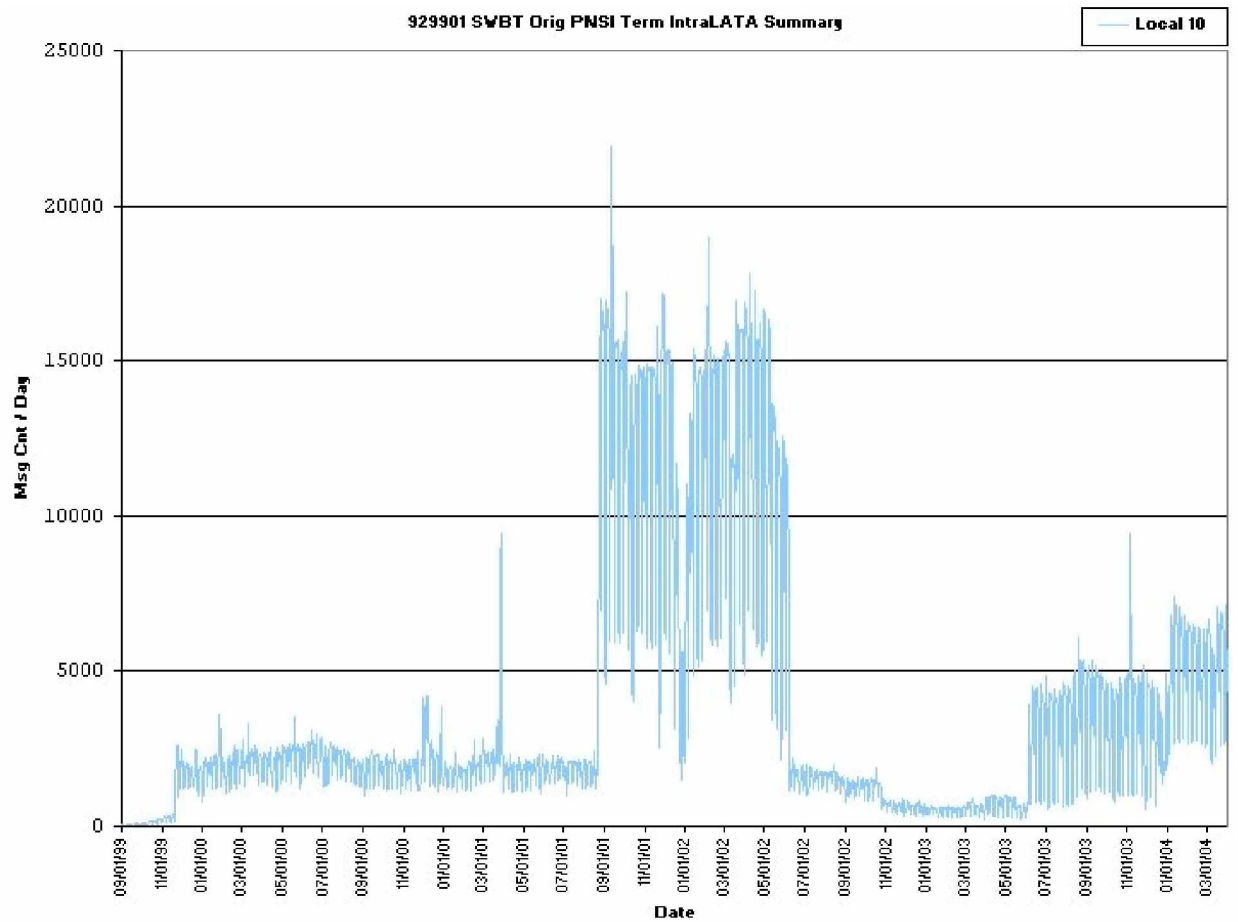
1. From November 1999 through February 1, 2002 the MTS toll traffic from SBC callers to the CLEC was negligible, even though this CLEC's customers included large call centers.
2. The sudden spike in traffic on February 1, 2002 is attributable, according to SBC, to major software changes they made in response to a Missouri Public Utility Commission ruling that mandated updates to the jurisdictional tables that govern MTS and EAS traffic.
3. Further investigation shows even more problems on the following page shows.

929901 SWBT Orig PNSI Term IntraLATA Summary (Local EAS 11)



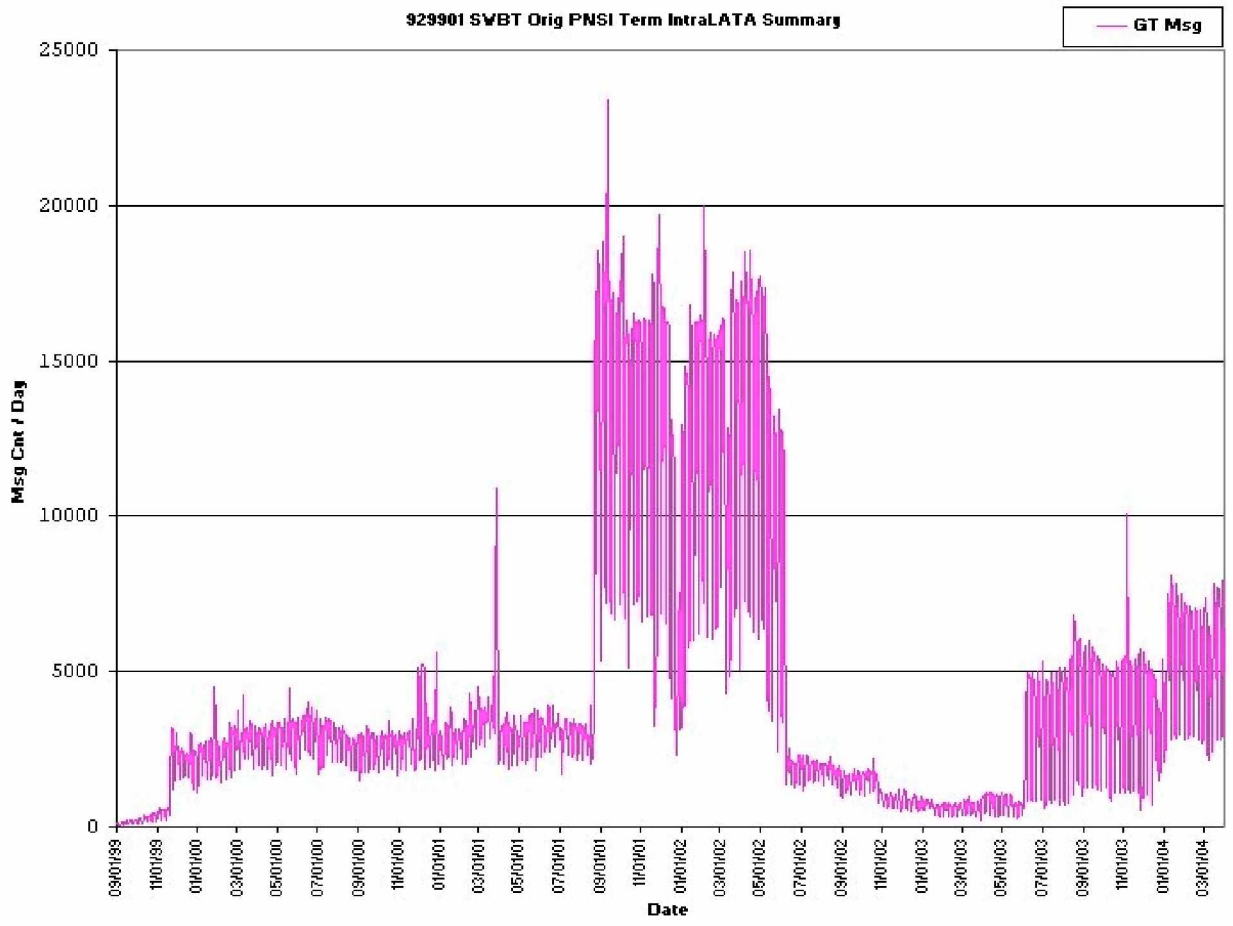
1. The pattern that is noted in this diagram of the CLEC's EAS traffic is equally baffling. Note the timeframe of the sudden drop which is again February 1, 2002, the date of the software revision noted in the previous diagram.
2. What does not add up however is SBC's explanation of the sudden drop in EAS traffic. SBC claims it overpaid CLECs for the higher priced traffic for the period before it was able to accurately jurisdictionalize this traffic. This diagram does not bear that explanation out. According to the patterns represented by these first two diagrams the reverse was true. The CLEC's MTS (which is premium priced "safe harbor" rated traffic under intrastate tariffs) was instead classified as ¼ cent per minute (\$0.002487 min) EAS traffic prior to February 1, 2002. This cannot possibly represent an "overpayment."
3. Even after SBC "corrected" their jurisdictional tables on February 1, 2002, the CLEC lost almost all of its EAS records. This is an impossibility given the fact that it had a 21 year old airline customer whose reservation number alone generated far more traffic than is represented here.
4. Finally it is noteworthy to point out that this traffic began to rebound (although not to previous levels) in early June 2003 – after the CLEC began complaining to the Texas Public Utility Commission.

929901 SWBT Originated PNSI Term IntraLATA Summary (Local 10)



1. In the interest of completion we present this diagram which represents the CLEC's total count of local records received from SBC. Although this particular CLEC is a "bill and keep" trading partner with SBC, not all CLECs are. Any CLEC who is not "bill and keep" should question SBC as to how it is adequately compensating CLECs, particularly ISPs, when their system indicates traffic patterns like these.
2. The most noteworthy item to note in this diagram is the fact that the dates have changed. Instead of a spike in traffic on February 1, 2002, the spike occurs on August 26, 2001. THIS DATE IS SIGNIFICANT AS IT INDICATES THE SAME PROGRAMATIC CHANGES THAT DEPRIVED CLECS OF HUNDREDS OF THOUSANDS OF DOLLARS IN "CABS" TRAFFIC (AND ON WHICH SBC PREVIOUS PAID CLAIMS) ALSO AFFECTED Category 92 RECORDS. In effect, when SBC's CLEC competitors' CABS records was lost, the local records above were simultaneously "fixed." SBC has been unable or unwilling to provide detail as to why. It is not inconceivable however that SBC "switched off" the premium priced CABS traffic simultaneous with "switching on" the lower rated junk records as a means of masking the change to less sophisticated CLECs who might notice the problem based on file size.
3. The same pattern of record recovery is evident in June '03, and like the previous diagrams, did not start until after the CLEC complained to the Texas PUC. SBC has been unable or unwilling to provide detail as to why.

SWBT Orig PNSI Term Intra LATA Summary (GT Msg)



1. The diagram above shows the grand total of all intraLATA records. It clearly illustrates the specific and suspicious spikes and drops in this CLEC's traffic.
2. As part of a preliminary audit with SBC, this CLEC checked its major customers and none of them experienced any major disconnections or "churn" which would explain anything close to these patterns. SBC also checked with the LSC and found no major customer disconnections or "churn."

So Where Did The Records Go?

The answers will shock you. Contact Us for More Information!