

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMMISSION ADVISORY AND COMPLIANCE DIVISION
Telecommunications Branch

RESOLUTION NO. T-12087
June 8, 1988

R E S O L U T I O N

RESOLUTION NO. T-12087. API PROTEST OF PACIFIC BELL ADVICE LETTER NO. 15336, THIS PROTEST HAS BEEN RESOLVED.

SUMMARY

Pacific Bell filed Advice Letter No. 15336, on January 22, 1988, to update Section 14.1.3, Availability of Methods Used for Developing V&H; Section 14.1.4, Availability of Maps and Section; 14.4, Serving Wire Center V&H Coordinate Information of Access Service Tariff, Cal. P.U.C. No. 175-T. API Alarm Company (API) protested Pacific Bell's (Pacific) filing claiming it does not comply with General Order 96-A due to errors, omissions, and unclear references. Pacific responded to the protest by filing Supplemental Advice Letters 15336A and 15336B on February 23 and May 4, respectively, to resolve the protest. These Advice Letters include mileage listings inadvertently omitted in the original filing, the availability of maps and formulas used to calculate billing mileage.

BACKGROUND

Pacific Bell filed Advice Letter No. 15336 to revise Section 14.4 of Pacific's Access Service Tariff, 175-T. This section contains the vertical and horizontal (V&H) coordinates to establish points between wire centers. These points are used to calculate mileage for WATS, Private Line Services, and other services used by large business customers. Pacific has not revised their V&H coordinate tariff since 1984. Public Utilities (PU) Code Section 451 requires up-to-date tariffs to be maintained with the California Public Utilities Commission (CPUC). When notified of this code violation by CPUC staff, Pacific filed Advice Letter No. 15336.

PROTEST

On February 9 and 26, 1988, API protested Pacific Bell's Advice Letter No. 15336. API's arguments are summarized as follows:

1) API claims that the format of the tariff used by Pacific in Section 14.4 of 175-T does not identify line by line revisions of the tariff, as required by GO 96-A, making review of the tariff difficult. API wants Pacific to file an appendix identifying all additions, deletions and omissions made in the tariff on a line by line basis.

2) API disputes the accuracy of Pacific's Advice Letter statement, "This filing will not increase any rate or change...". General Order 96-A requires any rates that are changed or increased must be stated in the Advice Letter. Without individual line by line revisions shown on the tariff, API claims, it is difficult to determine whether rates have been changed or increased.

3) API objects to Pacific's numerous format changes, which API believes contribute to making the tariff more difficult to understand rather than easier, as required by GO 96-A. API claims additionally column headings, such as "CCLI", "OT", "CC", "NXX", are not defined. That the order of the columns in Section 14.4 of Advice Letter No. 15336 are changed so as to make comparison with the current filing difficult. API wants Pacific to file a revised tariff with columns in the same order as the existing tariff.

4) API informally argues that in order to clarify the tariff, wire center boundary maps and documents explaining the methods used to develop V&H coordinates should be made available to the public. API also claims that Pacific needs to make further improvements to the tariff in the future.

Pacific responded to API's protest, by filing Supplemented Advice Letters 15336A and 15336B on February 23, and May 4, 1988 respectively.

Pacific gives the following reasons for the changes:

1) "Pacific's filing is designed to conform to the National Exchange Carrier Association (N.E.C.A.) Tariff F.C.C. No. 4, Section 16. N.E.C.A. collects all serving wire center and V&H data from exchange companies nationwide and files the information on their behalf in F.C.C. No. 4 which is the national standard used to calculate mileage for billing. It would be virtually impossible for Pacific to illustrate each and every historical change to the listing on a line by line basis. [due to the volume of changes that have taken place over the last four years]."

Advice Letter No. 15336A adds and updates 350 wire center references previously omitted due to an error in Pacific's records.

Advice Letter No. 15336B further updates wire center references, defines codes and headings, and makes publicly available wire center boundary maps and the formulas used to determine V&H coordinates.

2) Advice Letter No. 15336 updates Section 14.4 of Cal. P.U.C. Schedule No. 175-T (formerly Section 14.2) to conform with the national standard (N.E.C.A.). Pacific currently bills customers for mileage based on the V&H coordinates listed in Tariff F.C.C. No. 4. Therefore, the net revenue effect of updating the California tariff with NECA is zero.

3) Pacific states that column headings are explained on Sheet Nos. 2, 2-A, and 695-Z-77 to 695-Z-79. Pacific maintains the column order has not changed, but the information contained in each column has been sorted differently to improve readability.

4) Pacific agrees to include references to the availability of wire center boundary maps and documents explaining the methods used to develop V&H coordinates.

5) Additionally, after informal meetings with API, Pacific agrees to make further improvements to Section 14.4.

DISCUSSION

Pacific has submitted Supplemental Advice Letter Nos. 15336A and 15336B which address the issues raised in the protests. We therefore find that no good cause remains to sustain the protests.

FINDINGS

(1) Pacific Bell 175-T Access Tariff Section 14.4 (formerly Section 14.2) Section Serving Wire Centers, V&H coordinates has not been revised since 1984.

(2) API's protest claims that due to errors, omissions, and unclear references, Pacific's Advice Letter 15336 does not comply with GO 96-A.

(3) Pacific Bell's Supplemental Advice Letter Nos. 15336A and 15336B resolve all protest issues.

IT IS ORDERED that:

(1) The effective date of Advice Letter No. 15336, 15336A and 15336B is today.

(2) All tariff sheets filed under Advice Letter No. 15336, 15336A and 15336B shall be marked to show that such sheets were authorized by Resolution of the Public Utilities Commission of the State of California Number T-12087.

I certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on June 8, 1988. The following Commissioners approved it:

STANLEY W. HULETT
President
DONALD VIAL
FREDERICK R. DUDA
G. MITCHELL WILK
JOHN B. OHANIAN
Commissioners



Executive Director