

DESCRIPTION AND JUSTIFICATION

1.0 Introduction and Description of Filing

In this tariff filing, scheduled to become effective July 7, 2015, SMS/800, Inc. (hereinafter referred to as “Company”) proposes changes to Tariff F.C.C. No. 1, 800 Service Management System (SMS/800) Functions (SMS/800 Tariff) to add the Centralized Resp Org Change Management System service and that of a Web Services Interface (WSI) that can be used to access the Centralized Resp Org Change Management System. Proposed changes also include clarification of the requirements for deposit when establishing a Resp Org, removal of the ability to submit Resp Org Changes via first class U.S. mail or fax; clarification of charges for the initial security key, incorporation of WSI testing with the MGI testing rate, removal of the “per staff day” rate elements and the “per call” sampling rate element; addition of the required language regarding toll-free numbering fees, and an update to the dates and version numbers for current technical references to be available as of the filing date. The changes proposed required the addition of abbreviations and new pages, movement of existing material, changes to the table of contents, and the addition of new technical references to be available as of the filing date.

The proposed modifications are detailed below.

1.1 Modify Regulations and Service Offerings

- Changes in the Table of Contents reference the following proposed changes:
 - the addition of language for the FCC fees and the Company’s support of that effort;
 - Definitions for Centralized Resp Org Change Management System and Web Services Interface; and,
 - New pages and movement of material to accommodate the various changes.
- Explanation of Abbreviations: add abbreviations for Resp Org Change (ROC) and Web Services Interface (WSI) as these are proposed to be added within the tariff.
- On pages 10 and 11
 - Update the titles, issue numbers and dates for certain Technical Publications. All publications are available as of the filing date for this tariff.
 - Add a User Guide and two new specifications associated with the Centralized Resp Org Change Management System. All documents are available as of the filing date.
- General Regulations
 - Section 2.1.6(C):
 - Add changes to the Web Services Interface (WSI) specifications to the notification; and,
 - Change notifications for screen changes to any significant change, which may include screen changes if they are significant.

- Section 2.2.1: Distinguish from Section 2.1.8 SMS/800's ability to terminate service.
- Section 2.2.4: Add a new section with required language for the FCC fees to be implemented. This section appears on new page 26.1.
- Section 2.2.5: Add a new section stating the Company's support of the implementation of the FCC fee structure. This section appears on new page 26.1.
- Section 2.3.1: Update the process of notification of LECs and ICs to reflect how Resp Orgs perform their business today.
- 2.3.1(C)(2):
 - Update reference to section 3.6 to section 3.6.2 to accommodate proposed move of existing language to a new section
 - Replace "written" with "required" clarifying that the authorization of the subscriber may be in electronic format.
- Section 2.4.1 (A):
 - Add "has been suspended or disconnected for non-payment" to the first paragraph, as well as a new second paragraph that describes "history of late payments" to clarify the conditions under which Company requires a Resp Org to make a deposit.
 - Specify the deposit amount of \$4,000 as a proxy for the two-month average bill. This is amount currently collected as the deposit and has been used as the deposit amount for at least the previous 10 years. The average two-month bill today is approximately \$17,000. However, a deposit that high may create a barrier to entry for some small businesses.
 - Change to clarify that the Company will refund or credit the deposit amount upon the Resp Org establishing a one-year prompt payment record.
 - Move the last paragraph from page 39 onto new page 39.1
- Section 2.7: Add definitions for Centralized Resp Org Change (ROC) Management System and Web Services Interface (WSI)
- Service Offerings
 - Section 3.3.4: A new section added to describe the Web Service Interface that can be used to access the Centralized Resp Org Change Management System.
 - Section 3.4: Remove the ability to charge for Batch Update testing on a "per staff day" basis. Testing for Batch Updates has been billed on a "per staff hour" basis and there is no discount provided for the daily rate. Thus, Resp Orgs will see no change from the removal of the daily rate element.
 - Section 3.5: Moved from page 58 to page 59
 - Section 3.6: Title of this section changed from "Change of Resp Org Performed by Company" to "Change of Resp Org" to allow for the introduction of the Centralized Resp Org Change Management System within section 3.6.
 - Add Section numbers and headings for 3.6.1 and 3.6.2 as follows.
 - Section 3.6.1 describes the functionality of the Centralized Resp Org Change Management System. Note that this feature is proposed to be available with the effective date of this filing, but SMS/800 does not propose mandatory use of the service until February 15, 2016.
 - Section 3.6.2: The language previously in section 3.6 is now included as new section 3.6.2, with the following proposed changes:

- “written” is replaced with “required” to recognize that much of how business is done today is electronic. The authorization requirement does not change, just the format.
 - Removal of the ability to submit Resp Org Changes via mail or fax and clarifying that Resp Orgs can call the Help Desk for support.
 - Parts of this section were moved from page 60 to new page 60.1
- Schedule of Rates and Charges
 - Section 4.1.2(E)
 - Replace “Mechanized Generic Interface” with “MGI and WSI” allowing for this rate element to be used to support Resp Orgs implementation of both the MGI interface and the WSI interface to the Centralized Resp Org Change Management System.
 - Remove “per staff day” as an option for billing this rate element. The element has been billed on a “per staff hour” basis and there is no discount provided for the daily rate. Thus, Resp Orgs will see no change from the removal of this element.
 - Section 4.2 (A), the rate element for additional access tokens is proposed to be changed to “Per Initial, Additional or Replacement Security Key Defined” from “Per Additional or Replacement Security Key Defined.” This change clarifies that the initial security key is not included as part of the First Logon ID.
 - Section 4.2 (D)(2): Remove the “per call sampled” rate element. This element has not been charged in over ten years, and in the interim, the report charge has been modified to allow for an hourly report for those requests which require effort beyond the well known reporting activities. Any call sampling activity would be charged using the off-line, hourly report rate element.
 - Section 4.2 (E): Web Services Interface is proposed to be added to the current MGI testing rate. This element has been billed on a “per staff hour” basis and there is no discount provided for the daily rate. Thus, Resp Orgs will see no change from the removal of the “per staff day” rate element.
 - Section 4.2 (F)(1), this element has been billed on a “per staff hour” basis and there is no discount provided for the daily rate. Thus, Resp Orgs will see no change from the removal of the “per staff day” rate element.