Citizens Telecommunications Companies
Tariff F.C.C. No. 1
Description and Justification
Application No. 47
September 4, 2002

1. Introduction

Citizens Telecommunications Companies ("Citizens") submits herewith its Description and Justification ("D&J") in support of changes to its Tariff F.C.C. No. 1 filed under Transmittal No. ___, pursuant to sections 61.41 through 61.49 of the Commission's rules and relevant Commission orders. This filing is made on behalf of the exchange carriers issuing Citizens Tariff F.C.C. No. 1. In this tariff, five separate rate schedules are maintained. These rate schedules are referred to as Rate Group 1 through Rate Group 5, and correspond to the COSA codes CTC1 through CTC5. In this filing, Citizens makes revisions addressing concerns expressed by the Commission's staff in regards to Transmittal No. 124. This filing is being made on less than statutory notice with changes to material that has not yet gone into effect under authority of Special Permission No. _____.

2. Removal of Flex ANI

In Transmittal No. 124, Citizens sought to remove Flex ANI from its

tariff because the 36 month period for cost recovery expires on August 31, 2002. Staff expressed a concern that Citizens is still obligated to provide this service, and only the cost recovery has expired. In this filing, Citizens seeks to restore terms and conditions deleted in Transmittal No. 124, with the exception of language dealing with rates to be paid.

3. Letter of Authorization Processing

In Transmittal No. 124, Citizens proposed a new rate element for manual processing of Letters of Authorization (LOAs) authorizing the presubscription of the telephone numbers to be changed. Citizens referred to a technical publication in the language describing the default electronic format for LOAs, but failed to provide a reference as required by §61.74(f) of the Commission's rules. In this filing, Citizens seeks to amend the language dealing with LOAs and provide the reference required by §61.74.

4. Billing Language from Transmittal No. 124

In this Transmittal No. 124, Citizens made administrative changes including adding language to Section 2.4.1 to clarify what charges will appear on a customer's bill. Staff has requested more detail justifying this change. The specific language proposed in Transmittal 124 duplicates language found in other ILEC tariffs (e.g., Frontier Telephone of Rochester Tariff FCC No. 1). It specifies that the bill will include known unbilled charges from previous period. While Citizens makes every effort to bill on a current basis, at times charges are not billed on a timely basis. The most common reason for this is delays in obtaining usage information. For example, when Citizens is not the primary billing company in a meet point situation, Citizens must wait for the primary billing company to process its records and send billing information to Citizens. This sometimes results in non-current charges appearing on Citizens' bills to customers. The language proposed in Transmittal No. 124 for Section 2.4.1 describes this industry standard practice.