

**Completing Carrier's Representation
of NTS Communications, Inc.**

I Criteria for identifying calls that originate from payphones.

All originating 800 traffic which may be subject to compensation rules is collected on the NTS Dallas DSC DEX 600 switch. All 800 traffic is fed to the Dallas switch on specific inbound trunk groups via other carriers which are currently MCI and AT&T.

Each month, raw switch records are scanned for all calls that originate on the Dallas switch recorded with information digits that indicate that the call may have been placed from a payphone. The specific information digits looked for are 27, 29 and 70 which are the standard payphone indicators as per information provided by Telcordia Technologies in their LERG product. Records which match the above criteria are written to a combined monthly file of raw switch records which is used to feed our internally developed payphone compensation software. The entire switch record is captured which would include all relevant pieces of information such as time, date, originating number, terminating number, answer indicator, toll free number, trunk group, etc.

II Criteria for identifying compensable payphone calls.

Captured payphone records are scanned for answer type. Call records that contain an answer type other than 0 (No Answer) or 1 (Hardware Answer) are subjected to minimum duration logic. Call records which contain the answer type 1 (Hardware Answer) or meet the minimum duration logic are deemed to be compensable calls.

III Criteria for identifying incomplete or otherwise non-compensable calls.

Captured payphone records are scanned for answer type. Call records that contain an answer type 0 (No Answer) are deemed non-compensable. In addition, call records which contain an answer type other than 0 (No Answer) or 1 (Hardware Answer) are subjected to minimum duration logic. Call records which do not meet the minimum duration logic are deemed non-compensable.

IV Criteria used to determine the identities of the payphone service providers to which compensation is owed.

To determine the identities of the payphone service providers to which compensation is owed, NTS relies on CD's, diskettes and paper ANI lists supplied by LECs, payphone service clearing houses and individual payphone owners. This information is imported or entered into NTS' payphone compensation software. After loading all ANI information provided by the LEC, PSP, or Clearinghouse, the internal SQL database of compensable calls is matched to the supplied ANI information.

V Identity of any clearinghouse(s) used by the Completing Carrier.

NTS accepts information from all clearinghouses.

VI The types of information the Completing Carrier needs from the payphone service providers in order to compensate them.

In order to compensate a PSP, NTS needs the name and address of the PSP, and the payphone telephone number they own. This can be provided to NTS via a clearinghouse or directly from the PSP.