

JOSEPH MCNEAL, d/b/a PAGEDATA
P.O. Box 15509
Boise, ID 83715
(208) 375-9844

Attorney Pro Se

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

JOSEPH B. MCNEAL, d/b/a PAGEDATA,)	
)	
Complainant,)	CASE NO. QWE-T-03-25
)	
vs.)	
)	
QWEST CORPORATION,)	
)	
Respondent.)	
_____)	

COMPLAINANT'S SUPPLEMENTAL MEMORANDUM

Per the letter from Don Howell, Deputy Attorney General, dated August 10, 2004 requesting the status of Case No. QWE-T-03-25, Joseph B. McNeal d/b/a PageData hereby submits this Supplemental Memorandum to address additional information since the Complaint was originally filed October 31, 2003 and the Request for Summary Judgment was filed January 29, 2004.

In the interim the Idaho Public Utility Commission (“Commission”) has issued Order No. 29555 on August 2, 2004¹. In the Order the Commission recognized that PageData officially requested a single POI on or about September 1, 1998 “to take advantage of the Telecommunications Act’s single POI entitlement (47 U.S.C. § 251(c)(2)(B) and the FCC’s regulation 51.703(b) that prohibits Qwest from charging for delivery of its traffic to [PageData]”. (Order No. 29555 at 20)

The Court of Appeals recognized that the facilities and services that Qwest was providing to Mountain Communications were available at no charge under a single POI.² Likewise the Commission, in agreement with the Court of Appeals, limited the time that Qwest could charge PageData for facilities used to connect the multiple POIs to 22 months. At some point after September 1998 Qwest was obligated to install the single POI for PageData, which eliminated the need for the facilities used to connect the multiple POIs. (Order No. 29555 at 20 and 21) Using the SGAT as a guideline and the facilities installed for PageData’s single POI now, Qwest had 25 days to install the facilities.

Qwest is rejecting the Commission’s Order that Qwest can only charge PageData for 22 months. Qwest is still trying to charge PageData for not installing the single POI when originally requested and still charging the transit factor when Qwest has not provided the originating call data. The Court of Appeals and the Commission recognized

¹ *In the Matter of Robert Ryder DBA Radio Paging Service, Joseph B. McNeal DBA PageData and InterPage of Idaho, and Tel-Car, Inc. v. Qwest Corporation*, IPUC Case No. USW-T-99-24 and Supreme Court Docket No. 29175.

² “Mountain’s system of interconnection provided it no advantages other than those to which, presumably, it is entitled for free.” U.S. Court of Appeals, District of Columbia Circuit, *In the Matter of Mountain Communications, Inc. v. Federal Communications Commission*, No. 02-1255, Decided January 16, 2004, at p 7.

that the originating carrier is ultimately responsible for all charges. The Commission needs to enforce their Order No. 29555.

Through an informal complaint filed with the Federal Communications Commission ("FCC"), Qwest was forced to allow PageData to exercise its rights under § 252(i) and adopt the AirTouch/Arch interconnection agreement in all of Qwest's 14 state territory. The Commission approved this interconnection agreement on February 25, 2003. Also as a result of the informal complaint, Qwest stated that it would not continue to withhold facilities requested by PageData due to formally disputed outstanding charges.

In accordance with the interconnection agreement Section 6, Local Transport and Termination Rates, PageData submitted a sample invoice for flat rate 6000 MOU per trunk reciprocal compensation to Qwest. Qwest approved this sample invoice format on May 15, 2003 (See Exhibit A, Email from Tom Pontinen).

On June 4, 2003, in response to an informal complaint filed with the FCC, PageData received a settlement agreement from Bob McKenna (See Exhibit B, Email from Bob McKenna) clarifying Section 2.4 of the interconnection agreement. In its response, Qwest wanted to make sure that PageData did not charge reciprocal compensation for terminating Internet traffic. PageData formally submitted this settlement agreement as an amendment to the interconnection agreement on August 11, 2004. Commission staff mediated the installation of the facilities referenced in the settlement agreement.

On February 12, 2004 PageData received notice from Lori Lydon of Qwest representing that Qwest had sent a letter to PageData on December 19, 2003 saying all

reciprocal compensation under PageData's interconnection agreement would be applied to offset balances with Qwest (See Exhibit C, Email from Lori Lydon). This was the first time that PageData was made aware of the existence of the letter because PageData had not previously received this letter. Because PageData was not aware of the letter, Lori Lydon emailed it on February 12, 2004.

On February 16, 2004 Lori Lydon indicated that Qwest was going to continue applying the reciprocal compensation to offset accounts (See Exhibit D, Email from Lori Lydon).

On February 17, 2004 Joseph McNeal sent an email to Lori Lydon of Qwest complaining that Qwest was creating an illusionary billing crisis (See Exhibit E, Email from Joseph McNeal) because Qwest was not applying the reciprocal compensation credits as they had stated nor were they sending a check to PageData.

In response, on February 18, 2004 Lori Lydon sent an email stating that Qwest would be crediting PageData's account \$15,907.85 (according to the spreadsheet attached to the email showing \$15,907.85 as the amount due PageData (at that time) for flat rate reciprocal compensation under the interconnection agreement approved by the Commission (See Exhibit F, Email from Lori Lydon).

In response, on February 18, 2004 Sharon McNeal sent an email stating how PageData requested to have the credits applied to two accounts (See Exhibit G, Email from Sharon McNeal).

Through the assistance of Commission staff mediation Qwest installed PageData's long requested single point of presence (SPOP) in June 2004 under Account

R54-0008-008. PageData has submitted invoices to Qwest for flat rate 6000 MOU per trunk reciprocal compensation for these Type 2 facilities.

CONCLUSION

To date, PageData has invoiced Qwest a total of \$28,473.18 for flat rate 6000 MOU per trunk reciprocal compensation for PageData's Type 1 facilities and \$5,119.51 for PageData's Type 2 facilities.

To date, Qwest has not issued PageData reciprocal compensation payments for terminating Qwest originated traffic neither by check nor by crediting accounts requested by PageData despite several letters from Qwest stating they would credit PageData's account.

PRAYER FOR RELIEF

PageData requests that the Commission order Qwest to remove the transit charges from accounts 208 R51-0454 454 and R54-0008-008 per the Commission Order No. 29555 because Qwest has not provided any originating call data.

PageData requests that the Commission order Qwest to apply a portion of the reciprocal compensation credits to 208-375-8896-012B and issue a check for the remaining reciprocal compensation credit directly to PageData.

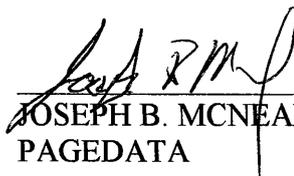
LIST OF ATTACHED EXHIBITS

- | | |
|-----------|---|
| Exhibit A | Email from Tom Pontinen (Qwest) dated May 15, 2003 approving PageData's sample invoice for reciprocal compensation using the flat rate 6000 MOU and Sample Invoice. |
| Exhibit B | Email from Bob McKenna (Qwest) dated June 4, 2003 |

clarifying that if PageData used interconnection facilities for Internet traffic that traffic would not be eligible for reciprocal compensation payments.

- Exhibit C Email from Lori Lydon (Qwest) dated February 12, 2004 with copy of letter dated December 19, 2003 concerning offsetting PageData's accounts.
- Exhibit D Email from Lori Lydon (Qwest) dated February 16, 2004 stating that direction with PageData to continue.
- Exhibit E Letter from Joseph McNeal (PageData) dated February 17, 2004 concerning reciprocal compensation payments.
- Exhibit F Email from Lori Lydon (Qwest) dated February 18, 2004 with spreadsheet showing \$15,907.85 as amount due PageData (at that time) for reciprocal compensation that would be credited to PageData's account.
- Exhibit G Email from Sharon McNeal (PageData) dated February 18, 2004 with spreadsheet showing PageData's request for crediting accounts and amounts.

RESPECTFULLY SUBMITTED this 18th day of August, 2004.



JOSEPH B. MCNEAL, d/b/a
PAGEDATA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of August, 2004, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Jean Jewell
Idaho Public Utilities Secretary
472 W. Washington Street
PO Box 83720
Boise, ID 83720-0074
 U.S. Mail Fax By Hand

William J. Batt
Marshall Batt & Fisher, LLP
US Bank Plaza, 5th Floor
101 S. Capitol Blvd.
Boise, ID 83701
 U.S. Mail Fax By Hand

Adam Sherr
Qwest
1600 7th Avenue – Room 3206
Seattle, WA 98191
 U.S. Mail Fax By Hand



JOSEPH B. MCNEAL

EXHIBIT A

Show Full Headers : **Subject:** Re: Sample Invoice

To: Sharon McNeal
<sharon@pagedata.com> [+]

From: "Tom Pontinen" <tpontin@qwest.com> [+]

Date: Thu, 15 May 2003 08:41:27 -0600

Move Message To :



Sharon,

This format works. Will you be e-mailing each month? We also have a question about the rates, are you aware of any cost docket rates that may possibly supercede the recip comp rates?

Thanks,
Tom

Sharon McNeal <sharon@pagedata.com> on 05/13/2003 04:24:43 PM

To: Tom Pontinen <tpontin@qwest.com>
cc:

Subject: Sample Invoice

(See attached file: C.htm)

(See attached file: PageData Sample Invoice.xls)

 [C.htm](#) **Content-Type:** text/html name="C.htm"
Content-Transfer-Encoding: base64
Length: 0.69 KB

 [PageData Sample Invoice.xls](#) **Content-Type:** application/msexcel name="PageData Sample Invoice.xls"
Content-Transfer-Encoding: base64
Length: 188 KB

REMIT TO: **PAGE DATA**

6610 Overland Rd.
Boise ID 83709
(208) 375-9844
ACNA: PDD

SAMPLE INVOICE

TO: Qwest Communications
Attn: Tom Pontinen
150 S. 5th Street Rm 550
Minneapolis, MN 55402
email: tpontin@qwest.com
(612) 663-7693
(612) 663-5995

INVOICE DATE:	2/1/03
INVOICE NUMBER:	2003651
BILL DUE DATE:	3/1/03
TOTAL AMOUNT DUE:	\$1,022.66

Please detach and return top portion with payment.

REIMBURSEMENT FOR TERMINATING QWEST ORIGINATED TRAFFIC

STATE: Idaho

Billing Period: 1/01/03-1/31/03

A. TRUNK GROUP	B. CIRCUIT ID DESCRIPTION	C. Type 1/ Type 2	D. Number of Trunks	E. MOU Per Trunk	F. Rate Per Type 1 Trunk	G. Compensable Traffic Factor	H. Reimbursement Due (D*E*F*G)
493	208-658-3400 101 T1 BOISIDTHHAA	Type 1	24	6000	\$0.003398	76%	\$371.88
237	208-736-5400	Type 1	4	6000	\$0.003398	76%	\$61.98
417	208-234-3800	Type 1	6	6000	\$0.003398	76%	\$92.97
129	208-677-8000	Type 1	2	6000	\$0.003398	76%	\$30.99
104	208-788-6800	Type 1	1	6000	\$0.003398	76%	\$15.49
735	208-525-3000	Type 1	3	6000	\$0.003398	76%	\$46.48
113	208-359-6900	Type 1	2	6000	\$0.003398	76%	\$30.99
334	208-672-3500 102 T1 BOISIDTHHAA	Type 1	24	6000	\$0.003398	76%	\$371.88
Subtotal							\$1,022.66
Taxes							\$0.00
Total Monthly Reimbursement Due							\$1,022.66
Previous Balance							\$0.00
Payment Received							\$0.00
Balance Forward							\$0.00
New Charges							\$1,022.66
TOTAL AMOUNT DUE							\$1,022.66



6610 Overland Rd., Boise ID 83709
(208) 375-9844

EXHIBIT B

-----Original Message-----

From: Bob McKenna [[mailto:"Bob McKenna"](mailto:Bob%20McKenna)]

Sent: Wednesday, June 04, 2003 3:02 PM

To: Joseph McNeal

Cc: Christopher Olsen; William Bill Batt; Bryan E Sanderson; Andrea E Sanchez; kpettey; dljenni

Subject: WaveSent and PageData

Text item: Message Text

Dear Mr. McNeal:

We have reviewed your May 28 responses to the FCC's questions concerning interconnection requests by PageData and WaveSent. Upon such review, we have determined that Qwest will not insist on resolution of Qwest's claims for payment of past amounts as a precondition to either PageData's or WaveSent's ordering further interconnection facilities and services from Qwest. Qwest will be willing to process properly submitted ASRs for interconnection on a timely basis upon submission.

In the past, PageData and WaveSent have had difficulty completing and submitting proper ASRs for service. Andrea Sanchez (303.965.1805) will be available to meet with you to assist you in preparing these documents. As Qwest has noted in its filings with the Federal Communications Commission, the ASRs that PageData sent to the Commission are not complete and do not provide sufficient information on which Qwest could begin to fill the order. In addition, while Qwest is willing to provide PageData and WaveSent with the interconnection facilities and services that they need to provide the services for which such interconnection can lawfully be utilized, the number of trunks shown on the two ASRs filed with the FCC is clearly excessive for the paging services that form the basis of the ASRs. These matters can be worked out with Ms. Sanchez, who can insure that the ASRs that you submit are complete and accurate.

Finally, irrespective of disputes over past amounts due, there does not seem to be any dispute that compensation will be necessary for services provided under current interconnection agreements. Such compensation can be required in the case of transiting traffic and WATS or FX equivalent facilities, on the one hand, and reciprocal compensation on the other hand. Should PageData or WaveSent use interconnection facilities or services for Internet traffic, such traffic would not be subject to reciprocal compensation payments. Qwest would, of course, run its standard credit check on WaveSent to determine whether a deposit is necessary. These and similar compensation matters likewise can be worked out in advance with Ms. Sanchez. It makes sense to determine at this time what facilities and services must be paid for, and by whom.

Please do not hesitate to give me a call with questions. I can be reached at 303.672.2861.

EXHIBIT C

Show Full Headers : **Subject:** Page Data Offset Letter

Date: Thu, 12 Feb 2004 15:27:47 -0700

From: "Lydon, Lori" <Lori.Lydon@qwest.com> [+]

To: <Sharon@Pagedata.com> [+]

Move Message To :

[Reply](#) [Reply to Date](#) [Reply All](#) [Forward](#) [Next](#) [Previous](#) [Delete](#) [Print](#) [Message 437/679](#)

Sharon, Attached please find a copy of the letter sent out regarding offsetting Page Data's balance owed against what we owe. I touched base with Cindy Minor and have sent Barb Newman a email so I should hear something soon and will let you know. Thanks, Lori

Lori Lydon

Lexcis Payables

Phone: 515-241-1202

FAX: 515-286-4023

Email: Lori.Lydon@qwest.com



[Clear Day Bkgrd.JPG](#)

Content-Type: image/jpeg name="Clear Day Bkgrd.JPG"

Content-Transfer-Encoding: base64

Length: 5.54 KB



[Page Data Offset
Ltr.doc](#)

Content-Type: application/msword name="Page Data Offset
Ltr.doc"

Content-Transfer-Encoding: base64

Length: 20 KB

*Qwest
Lexcis Payables
Lori Lydon, SDC
900 Keo Way – 4 South
Des Moines, IA 50309
Phone: 515-241-1202
E Mail: Lori.Lydon@qwest.com*

December 19, 2003

*Page Data
6610 Overland Road
Boise, ID 83709
ACNA: PDD*

To Whom It May Concern:

Qwest has received and validated your Invoice # 2003725. Due to the outstanding balance owed Qwest and subsequent failure to keep your account current, Qwest will apply all monies owed by Page Data. as an offset to the balance owed Qwest.

This process will continue until your account with Qwest becomes current, but may be reinstated at any time that your account becomes delinquent.

Please feel free to contact me if you have any questions.

*Sincerely,
Qwest*

*Lori Lydon, SDC
cc: Barb Newman*

EXHIBIT D

Show Full Headers : **Subject:** Page Data -ICA

Date: Mon, 16 Feb 2004 05:44:13 -0700

From: "Lydon, Lori" <Lori.Lydon@qwest.com> [+]

To: <Sharon@pagedata.com> [+]

Cc: "Sanderson, Bryan" <Bryan.Sanderson@qwest.com> [+]

Move Message To :

[Reply](#) [Reply All](#) [Reply](#) [Reply All](#) [Forward](#) [Next](#) [Previous](#) [Delete](#) [Print](#) [Message 434/679](#)

Sharon, I have made several calls and emails regarding payment of your account. At this time the direction will continue as in the past since I am being told that Page Data is in the process of signing an ICA, and no formal decisions have been made at this time. Once directed, I can get payment processed in 2-3 days. Thanks, Lori Lydon

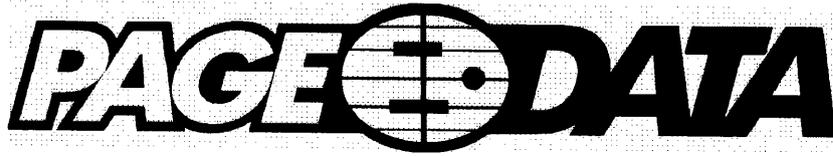
*Lori Lydon
Lexcis Payables
Phone: 515-241-1202
FAX: 515-286-4023
Email: Lori.Lydon@qwest.com*



Clear Day Bkgrd.JPG

Content-Type: image/jpeg name="Clear Day Bkgrd.JPG"
Content-Transfer-Encoding: base64
Length: 5.54 KB

EXHIBIT E



SENT VIA EMAIL

February 17, 2004

Lori Lydon
Lexcis Payables
Qwest
900 Keo Way – 4 South
Des Moines, IA 50309
515-241-1202
515-286-4023 Fax

RE: PageData Reciprocal Compensation Payments

Dear Ms. Lydon:

Sharon informed me of the email she received from you yesterday. This do nothing policy is unacceptable.

We were informed through correspondence with Qwest that you were the person designated to handle this, but now we find that is not so and we are getting the Qwest run-around again. Who specifically at Qwest is making these decisions so he or she can be held accountable? This shadowy person needs to come forth.

PageData already has an ICA with Qwest. There are no scheduled negotiations between PageData and Bryan Sanderson of Qwest at this time.

To date PageData has not received any reciprocal compensation payments. This is in direct violation of the ICA. Qwest has claimed that it is crediting PageData's accounts BAN 208 R51-0454-454 and 208-375-8896, but PageData has not seen Qwest issue credits for the reciprocal compensation to these accounts and invoices designated by PageData. Every month that PageData receives invoices from Qwest the balances are increasing, but the balances should be zero if the reciprocal compensation has been applied. Who specifically is responsible for crediting these accounts? This individual's failure to credit these accounts only exacerbates the billing problems in the other Qwest billing departments.

It is Qwest's non-responsiveness that is creating an illusionary billing crisis at Qwest. Since PageData received its first facilities from Qwest, the reciprocal compensation due and owing PageData has always offset any lawful charges due Qwest by PageData. Qwest has failed to recognize this point. That is what this billing crisis is about.

PO Box 15509
Boise, Idaho 83715

Telephone (208) 375-9844
Facsimile (208) 373-7159

6610 Overland Road
Boise, Idaho 83709

Qwest is expecting payment from PageData while Qwest continues to unlawfully hold reciprocal compensation from PageData for terminating Qwest originated traffic. This is inconsistent with resolving the problems on a going forward basis.

Qwest cannot have it both ways. Qwest must either issue payment for reciprocal compensation directly to PageData or it must apply the reciprocal compensation to BAN 208 R51-0454-454 for corrected invoices from March 2003 to date and 208-375-8896 from October 2003 to date. Note that any so-called balances prior to March 2003 on BAN 208 R51-0454-454 and all other accounts up to date are under active, formal dispute in federal and state court. PageData cannot be penalized in any way for disputing unlawful charges, as Qwest is attempting to do.

The indecisiveness of the individual(s) at Qwest is generating meetings for meetings and endless paperwork going nowhere rather than resolving the issues. It was our understanding that the relationship between PageData and Qwest was going to be normalized on a going forward basis and each party would start paying each other according to the ICA.

Qwest has created this illusionary billing crisis through its old, entrenched, unlawful policies that were carried out by the previous paging product manager, Sheryl Fraser, in contradiction of the 1996 Telecommunications Act. The recent US Court of Appeals District of Columbia Circuit decision on January 16, 2004, in the Mountain Communications, Inc. vs. Federal Communication Commission (Case No. 02-1255) and the US Court of Appeals Fourth Circuit decision on December 18, 2003 in the MCI Metro Access Transmission Services Inc. vs. Bell South Telecommunications (Case No. 03-1238) have further substantiated PageData's interpretation of the 1996 Telecommunications Act and rejected Sheryl Fraser's group's interpretation of the 1996 Telecommunications Act. Qwest itself is rejecting its old policies with the availability of the new ICAs that are more in line with the 1996 Telecommunications Act by including a single point of presence option and reciprocal compensation. However, individuals inside and outside Qwest are advising Qwest to continue trying to collect money from PageData for past Qwest billing policies that the courts have deemed unlawful.

Qwest's withholding of reciprocal compensation is unlawfully penalizing PageData for exercising its rights to dispute charges and is the source of the imaginary billing crisis because Qwest is aware that the reciprocal compensation will be redistributed back to Qwest to pay for accounts BAN 208 R51-0454-454 and 208-375-8896. Correcting the billing starts with the reciprocal compensation. Qwest has refused to correct the billing through an external process by paying PageData directly or through an internal process of applying the credits to the accounts and invoices designated by PageData.

In Conclusion

Your letter dated December 19, 2003, that you emailed Sharon on February 12, 2004, is unlawful for two very important reasons: 1) under the ICA, Qwest must issue reciprocal compensation payments directly to PageData; and 2) Qwest has no legal authority to apply reciprocal compensation due and owing PageData to actively disputed accounts that are before federal and state court. Further, your letter claims that Qwest has applied monies owed PageData to offset

balances, but this has not been done. Why would Qwest issue a legally binding letter and not apply the credits to the accounts that PageData designates?

We expect this situation to be corrected. According to Idaho law, if an ILEC such as Qwest is holding money, Qwest must apply the credits to accounts and items that PageData designates. The next invoices PageData receives for accounts BAN 208 R51-0454-454 and 208-375-8896 should be zero if Qwest follows through on either one of the two promises it made to PageData through either your unlawful letter or the ICA.

Sincerely,

/s/ Joseph B. McNeal
Joseph B. McNeal

cc: Bryan Sanderson
Sheila Pederson
Vickie Boone
Cindy Minor

EXHIBIT F

WIRELESS TRACKING

COMPANY: PAGE DATA
 STATE: ID

BILL DATE	USAGE END DATE	TERMINATING QWEST ORIGINATED TRAFFIC	INTEREST AND LATE PYMT CHGS	MISC CHG NOTES	MISC CHGS	ADJUSTMENT NOTES	ADJUSTMENT S	TOTAL BILLED	TOTAL AMT DUE
		Minutes	Amount	Amount	Amount	Amount	Amount	Amount	Amount
1/1/03	DEC	0	\$ -	\$ -				0.00	
2/1/03	JAN	0	\$ -	\$ -				0.00	
3/1/03	FEB	0	\$ -	\$ -				0.00	
4/1/03	MAR	0	\$ -	\$ -					
5/1/03	APR	144,000	\$ 1,022.66	\$ -				3,067.99	\$ 3,067.99
6/1/03	MAY	144,000	\$ 1,022.66	\$ -				1,022.66	\$ 4,090.65
7/1/03	JUNE	144,000	\$ 1,022.66	\$ -				1,022.66	\$ 5,113.31
8/1/03	JULY	144,000	\$ 1,022.66	\$ 119.06				1,141.72	\$ 6,135.97
9/1/03	AUG	144,000	\$ 1,022.66	\$ 200.39				1,223.05	\$ 7,277.69
10/1/03	SEPT	144,000	\$ 1,022.66	\$ 394.29				1,416.95	\$ 8,500.74
11/1/03	OCT	144,000	\$ 1,022.66	\$ 394.29				1,416.95	\$ 9,814.89
12/1/03	NOV	144,000	\$ 1,022.66	\$ 628.98				1,651.64	\$ 11,231.84
2003 TOTALS		1,152,000	\$ 8,181	\$ 1,737.01			\$ -	12,986.28	

2/1/04 Jan 144,000 \$ 743.75 743.75 \$ 15,907.85

EXHIBIT G

Show Full Headers : **Date:** Wed, 18 Feb 2004 15:25:54 -0700

From: Sharon McNeal <sharon@pagedata.com> [+]

To: Lydon [+], Lori <Lori.Lydon@qwest.com> [+]

Cc: joseph@pagedata.com <joseph@pagedata.com> [+], Barbara Newman <Barb.Newman@qwest.com> [+], Vickie Boone <vickie.boone@qwest.com> [+], Cindy Minor <Cindy.Minor@qwest.com> [+], Linda Downey <Linda.Downey@qwest.com> [+]

Subject: Re: Spreadsheet of Outstanding Balances

Move Message To : 



Lori,

I have taken the total amount due PageData (\$15,907.85) from your spreadsheet that you sent earlier today and made another spreadsheet, which I have attached, to show how the reciprocal compensation credits should be applied to the two PageData accounts (BAN 208 R51-0454-454 and 208-375-8896). After applying the credits per the attached spreadsheet, both accounts should be current with a zero balance and net reciprocal compensation still due PageData in the amount of \$5,201.70. Since PageData has not received an invoice for BAN 208 R51-0454-454 since Cindy has entered the corrections to the billings, she will need to verify the outstanding balance on that account, but our numbers should be very close.

Who will apply these credits to the accounts? Will it be Cindy Minor or you? When will the credits be applied? It is my understanding the R51 account will be billing again next week and it would be beneficial if the credits were applied before the next billing.

Thanks,

Sharon McNeal

- > Joseph and Sharon, Attached please find our spreadsheet showing the
- > amounts that will be credited to your account. We apologize for the
- > confusion and look forward to the opportunity of working with you in the
- > future. Thanks, Lori Lydon
- >
- > Lori Lydon
- > Lexcis Payables
- > Phone: 515-241-1202
- > FAX: 515-286-4023
- > Email: Lori.Lydon@qwest.com
- >
- >
- >
- >

 [PageData Accounts to Credit 2-18-04.xls](#)

Content-Type: application/vnd.ms-excel name="PageData Accounts to Credit 2-18-04.xls"

Content-Transfer-Encoding: base64

Length: 13.5 KB

PageData Accounts to be Credited
2/18/04

Reciprocal Compensation Due PageData Through February 1, 2004	\$15,907.85
Less Balance on BAN 208 R51-0454-454 Through February 2004	- \$7,854.54
Less Balance on 208-375-8896 Through Feb. 7, 2004	- \$2,851.61
Net Reciprocal Compensation Due PageData	<u>\$5,201.70</u>