

Approval ~ Kitemark Licence KM 78145.

Only BAPT responded during the Notification period. BAPT had a number of discrete comments that can be summarized into four points as described below.

The first point can be summarized as; difficulty in determining compliance of Billing Bureau with the Oftel Metering & Billing Direction.

BSI believes enough direction exists in the Metering and Billing Direction and guidance exists in the Scheme Guide and MABG5 to permit Approval of a Billing Bureau such as Tempest and therefore BSI determined compliance accordingly.

The second point can be summarized as; no visibility of what Column of Table 1 of the Oftel Metering & Billing Direction was allocated or what apportionment of Columns in Table 1 was made.

BSI had not seen this information in previous Notifications or Draft Approvals from BAPT or NQA. BSI thought it was transparent that Column 3 of Table 1 in Oftel's Metering and Billing Direction had been allocated to Tempest because the draft Approval (the Kitemark Licence) stated the scope as;

BILLING and FULFILMENT SYSTEMS managed by TEMPEST TECHNOLOGY LIMITED used for BILLING of PUBLIC COMMUNICATIONS NETWORK SERVICES by the BRANDS...

BSI understands that if apportionments are made, agreements have to be entered and publication of such agreements has to be visible to the Approval Body Forum. BSI has no reason to believe the same is required if Columns of Table 1 are allocated completely to one or other entity.

No further apportionment had been carried out and Column 3 was allocated because all information and guidance available leads Approval Bodies this same way.

Examples of the information and guidance available are:

A. Table 1 in Section 3 of the Direction shows the tolerances to be allotted to a billing function as delivered by a Billing Bureau such as Tempest.

| Chargeable Events | ① Logging / Metering | ② End to End | ③ Billing |
|-----------------------------|----------------------|-----------------------------|-----------------------------|
| Number under or not charged | 0.01% (1:10K) | 0.1% (1:1K) | 0.09% ^a (1:1.1K) |
| Number overcharged | 0.002% (1:50K) | 0.004% (1:25K) | 0.002% (1:50K) |
| Value under or not charged | Not Applicable | 0.05% (1:2K) | 0.05% (1:2K) |
| Value overcharged | Not Applicable | 0.002% ^b (1:50K) | 0.002% ^b (1:50K) |

^a. Determined from end to end and logging requirements.
^b. This requirement shall be deemed to have been met if the value overcharged does not exceed £500 per calendar month.

B. Clause 5.7 of the Guide states, "Although the Scheme is aimed at Communications Providers, it is also open for a billing bureau to apply for voluntary approval in its own right. This is a logical extension to the concept of a multi-Communications Provider TMBS. It may have appeal when a billing bureau has a number of Communications



Provider clients and its services can be adequately bounded and suitably described on an approval certificate”.

- C. Annex C of the Direction shows Column 3 of Table 1 can be allocated to Tempest because Tempest are “Applying prices to CDRs” (#4) and conducting “Fulfilment” (#5).
- D. MABG5 on page 2 states in 6. “Billing (post-paid TMBS) – the preparation of the files for customer billing, including recurring payments (e.g. rentals, facility charges) and one-off charges (e.g. connection charges)”.
- E. MABG5 on page 2 states in 8. “Fulfilment – the preparation, printing and dispatch of customer invoices (for post-paid customers)”.
- F. MABG5 shows on page 2 in tabular form, that 100% of Billing (Column 3) in Table 1 of Oftel’s Metering and Billing Direction can be applied to Tempest because Tempest conducts Mediation through to Fulfilment.

| TMBS Element | Likely Owners | Column Used | Comments |
|----------------|---------------|-----------------------------------|---|
| Billing | SP BB | 100% of Billing (Column 3) | If the SP BB conduct mediation through to Fulfilment |

BSI was fully aware of MABG5 and the information relating to the operation of a multi-Communications Provider TMBS when assessing Tempest. A complete review was conducted and due regards were paid to these issues when the Approval decision was made.

The third point can be summarized as; not knowing what Column of Table 1 or what apportionment of Columns in Table 1 could be allocated to a Communications Provider using Tempest and suggested that a Communications Provider could be required to operate error free.

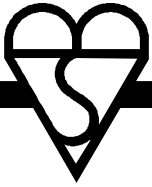
BSI cannot envisage that a Billing Bureau such as Tempest could operate a in a TMBS exclusively with one Communications Provider. If this was to occur then the available guidance permits allocation of Column 1 of Table 1 to the Communications Providers as Column 3 is allocated to the Billing Bureau. If the nature of this new TMBS meant Column 1 and 3 could not be allocated then Column 2 would be apportioned appropriately.

The fourth point can be summarized as; greater revision and implementation control for new and revised guidance documentation is required.

BSI agrees that if new regulations, standards or guidance were to emerge, then Tempest would migrate to these new requirements in a timely manner and be assessed against them during continual assessment to maintain compliance.

This would be the same as for those Communications Providers that moved from OTR 003: 1993 through OTR 003: 2001 to the Metering and Billing Direction. This sort of transition can be seen elsewhere and worked well for ISO 9000: 2000.

We work in real time with the tools we have today. The requirements in existing documentation are sufficient to Approve Tempest Technology Limited as a Billing Bureau.



Summary

BSI now assumes MAGB5 is not particularly useful for a Billing Bureau who's TMBS may have so many beginnings and endings. MAGB5 could however continue to be used to exclude tolerance from a Carrier Communications Provider that outsourced some part of the TMBS for its own purposes without the required level of control or to apportion tolerance to a Reseller Communications Provider who does not Bill or manage Switches if Column 3 cannot be allocated completely. MAGB5 should be used whenever Column 2 is being apportioned.

BSI concludes that the Tempest Approved will satisfy both the requirements and the spirit of the Metering and Billing Approval Scheme. Tempest has met all the Technical and Administrative requirements of that Approval Scheme.

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