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November 12, 1998

Hon. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Truth-in-Billing and
Billing Format - CC Docket No. 98-170

Dear Ms. Salas:

The New York State Department of Public Service (NYDPS) submits this letter in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above captioned proceeding.

The NYDPS agrees with the Commission's goal that consumers should be given the means to verify the accuracy of charges on their telephone bills within the bill format itself. Rather than adopt prescriptive rules that could dampen market innovation, however, we believe the Commission should rely on the market participants to develop billing formats that meet consumers' information needs. Such formats should be clearly organized, highlight new charges, identify service changes, and provide full and non-misleading descriptions of charges.

We also believe competitors will agree, in the interest of providing full disclosure, that each bill should identify every service provider, including resellers and service providers using a billing warehouse, and that all service providers should list toll-free numbers for inquiries and complaints.¹ Furthermore, it could be productive for the Commission to convene a working group that includes consumer groups, carriers, state regulatory commissions, and other interested parties to establish

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¹ See 16 NYCRR 609.12

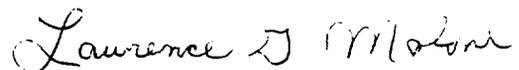
NYDPS Comments - November 12, 1998
Truth-in-Billing and Billing Format
CC Docket No. 98-170

standards for bill formats,² in the event the industry is unable to satisfactorily resolve the Commission's concerns.

Finally, we also agree that many of the carriers' explanations of universal service and access charges have caused complaints by consumers. Standardized, "safe harbor" language should be developed through industry consensus or, in the alternative, through a collaborative process rather than by Commission mandate.

We look forward to working with the Commission, the industry and consumer groups to harmonize ongoing state and federal efforts to ensure that telephone bills provide clear and accurate information as we transition to a competitive telecommunications market.

Respectfully submitted,



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² With regard to a Commission mandate for customer service representative training this seems unnecessary in the absence of company-specific complaints. Instead, the Commission should monitor complaints received against particular carriers and take corrective action where such carriers appear to have an inordinate number of complaints given its size or in a particular area.

In the Matter of Truth-in-Billing and
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CERTIFICATE OF SERVICE

I, Lucille T. Dillenbeck, hereby certify that an original and four (4) copies of comments in the above-captioned proceeding were sent via Airborne Express to Magalie Roman Salas, Secretary to the Federal Communications Commission. A copy was also filed electronically. In addition, copies were sent by First Class Mail, postage prepaid, to all parties on the attached service list.

Lucille T. Dillenbeck

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