
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Implementation of the Subscriber Carrier)
Selection Changes Provisions of the)
Telecommunications Act of 1996)
)
Policies and Rules Concerning) CC Docket No. 94-129
Unauthorized Changes of Consumers) FCC 98-334
Long Distance Carriers)

**RESPONSE OF SBC COMMUNICATIONS INC.
TO PETITIONS FOR RECONSIDERATION**

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SUMMARY

SBC supports the absolute rule, which is a reasonable and practical method of implementing Section 258 of the Telecommunications Act of 1996 (FTA 96). The absolute rule effectively implements the legislative intent that the slamming carrier not receive any money as the result of its illegal slam.

It is the position of SBC that there is no problem with the authorized carrier making the slamming determination. Since the rules spell out very clearly what is required for authorization and verification, making the slamming determination is simply a matter of requesting the proof of verification and examining that proof to see whether it complies with the rules. There is very little room for bias in favor of the customer to be applied to that process. The Third Party Administrator (TPA) proposal proposes to conduct the very same type of investigation that will be done by authorized carriers.

SBC opposes any requirement that LECs establish an automated order process for carrier freezes. Carrier freezes are for the protection of customers and any requirement that LECs accept carrier orders for freezes will destroy the efficacy of the freeze program.

Clarification is needed as to how the slamming carrier is to receive notice of the alleged slam under the order. This one problem must be fixed, so that the rules can be allowed to go into effect and slamming can be stopped.

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Comes now SBC Communications, Inc.¹ ("SBC") to file this, its response to the Petitions for Reconsideration in the above-referenced docket. SBC filed its own Petition for Reconsideration and Clarification in this docket on March 18, 1999. However, the only point SBC raised for reconsideration was the provision in §64.1180(e)(1) that requires the authorized carrier to place the charges of the alleged slamming carrier on the customer's bill when the authorized carrier determines no slam occurred.

¹ SBC Communications Inc. is the parent company of various subsidiaries, including telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company ("SNET"). The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

It is the position of SBC and apparently the position of the majority of the industry² that the exonerated carrier should re-bill and collect its own charges when a determination is made that no slam occurred. Otherwise, SBC supports the Federal Communications Commission's (Commission's or FCC's) Slamming Rules, although SBC did also ask for clarification of some portions of the Order that require interpretation or where there appears to be a difference between the requirements adopted in the rules and the requirements of the Order. SBC, as authorized carrier, began verifying carrier change orders in compliance with the Order on April 27, 1999. However, it is apparent that some other carriers are not complying with those requirements. It is also apparent that there is little risk associated with ignoring the verification rules until the liability rules also become effective. SBC developed and implemented methods and procedures for complying with the slamming rules in preparation of the effective date of May 17, 1999, but had to revise those procedures to recognize the court stay granted on that same date. Set forth below are the comments of SBC on the issues raised in the various Petitions for Review on an issue by issue basis, rather than a separate response for each Petition for Review.

I. ABSOLUTION RULE

SBC supports the Commission's Rule set forth in Part 64, Subpart K, §64.1100(d) implementing §258 of the Federal Telecommunications Act of 1996 ("FTA96"). Section 258 requires that slamming carriers must send any money collected as a result of a slam to the authorized carrier and that the authorized carrier must refund any difference between what the customer would have paid absent the slam to the customer. Thus, the

² Local Exchange Companies (LECs) generally do not want to be required to bill charges they may not even understand on behalf of carriers with whom they may not have any billing agreement. Interexchange Carriers (IXCs) also seek to have the Commission make the exonerated carrier responsible for billing its own charges as a part of their Third Party Administrator proposal (TPA) set forth on Page 26 of the Joint Petition for Waiver filed on March 30, 1999 in this docket, which the Joint Petitioners have represented to be supported by the entire IXC industry.

slamming carrier gives up all funds collected as a result of its illegal action, the customer is made whole, and the authorized carrier receives some revenue to help offset the cost of providing the customer refund and the additional handling necessary to restore the customer to its service. The rule written by the Commission implements Section §258 exactly as written in situations where the customer has paid the slamming carrier for services provided after the slam. Section 258 specifically provides that a carrier that violates the verification rules and collects charges for local or long distance service will be liable to the authorized carrier in an amount equal to the charges paid, "in accordance with such procedures as the Commission may prescribe." Numerous parties, including Sprint Corporation (Sprint), AT&T Corp. (AT&T), GTE Service Corporation and its affiliated domestic companies (GTE), and Frontier Corporation (Frontier) seek reconsideration of the FCC's rules that provide for a thirty day absolution period. If the slammed customer has not paid any of the slamming charges, that customer will not be liable for any charges for the first 30 days after the carrier change occurs.³

Section 258 does not detail how slams are to be handled in situations where the customer has not yet paid any money to the slamming carrier. Thus, the FCC had to address that situation in order to have a workable rule. The rule that the FCC has written is a reasonable and practical extension of the statutory intent reflected in Section 258 that the slamming carrier not be allowed to keep any of its ill-gotten gains. The customer is simply exonerated from any obligation to pay for calls made within the first thirty days after the slam occurs. True, the slammed carrier does not recover the revenue it would have received had the slam not occurred, but neither did it incur any cost for those calls, since those calls were carried by the slamming carrier. Further, the authorized carrier did not incur the administrative cost of re-rating the calls carried by the slamming carrier in order to bill the customer at the same rates the customer would have been billed absent

³ §64.1180(b).

the slam. Finally, in all likelihood, a slam where no charges have been paid is less likely to have continued for any extended period of time. Given all of those considerations, the most practical solution to effectuating the legislative intent of taking the profit out of slamming, while keeping the customer whole, was to do exactly as the Commission did and exonerate the customer from any liability for the slamming charges.

Alternatively, the Commission could have directed the slamming carrier to forward its bills to the authorized carrier and the authorized carrier could bill and collect its own rates for the calls made over the slamming carrier's service, if it chose to do so. Such rule would also have been consistent with the statutory objective of taking the profit out of slamming. However, in most instances, where the customer calls its LEC or authorized carrier to question charges from a new carrier before paying the first bill, those charges will not be high enough to make it worth the trouble to re-rate and re-bill the charges. Customers who have been slammed normally call their authorized carrier or their executing carrier immediately upon discovering the carrier change, whether that discovery is made as the result of a customer notification program or as the result of receiving a bill from the slamming carrier. There is little incentive for fraud if the customer is immediately returned to its authorized carrier upon discovering the slam.⁴

True, the customer does not have to pay for calls carried by the slamming carrier, but the statute very clearly intends that the slamming carrier will not receive any compensation for its slamming service. So, while the Commission could probably have required the same re-rating process in situations where the customer has not paid the bill that it requires in situations where the customer has paid the bill, such rule would not have satisfied the majority of the carriers that are complaining of the absolution rule

⁴ Of course, there is always the risk of actual customer fraud, but that would require a customer to initiate a carrier change in such a manner as to be able to claim to have been slammed. Otherwise, verification evidence will be sufficient to rebut any false slamming allegation and the thirty-day absolution period will not apply.

because those same carriers are also seeking to avoid the re-rating process where charges have been paid.

As proof of that fact, SBC would point out that AT&T and Sprint are both Joint Petitioners in the Third Party Administrator (TPA) proposal filed by MCI.⁵ In that proposal, the Joint Petitioners seek a waiver of the Commission's slamming rules requiring, among other things, a re-rating of the slamming carrier's charges to provide a precise refund to the slammed customer. The Joint Petitioners propose that the authorized carrier simply provide a refund to the slammed customer in the amount of 50% of the money paid by the customer to the slamming carrier in order to avoid the cost of re-rating the slamming carrier's charges. Unless the slamming carrier's rates are more than double those of the authorized carrier, the authorized carrier is going to be providing a refund that exceeds the amount required by the statute in situations where the customer has paid the charges, but that does not allow the slammed carrier to recover all of its revenue foregone because of the slam. So, while these Interexchange Carriers (IXCs) are here complaining of the lack of a remedy to make the authorized carrier whole, those very same carriers are also proposing to replace the Commission's rule that accomplishes that purpose with a substitute procedure that does not make the authorized carrier whole in order to avoid the burden of re-rating calls carried by another carrier.

II. SLAMMING DETERMINATION

AT&T and Sprint both oppose the requirement in §64.1170(a) and §64.1180(c)(d) and (e) of the Slamming Rules that the authorized carrier make a determination as to whether a slam has occurred. AT&T argues that the slamming determination will have an economic impact on the authorized carrier that is investigating the slam, so that the

⁵ Joint Petition for Waiver filed by AT&T Corporation, Sprint Corporation, MCI Worldcom, Inc., and Competitive Telecommunications Association in CC Docket 94-129 on March 30, 1999.

authorized carrier cannot serve as an unbiased fact finder.⁶ Such allegation ignores the fact that in most instances, the investigation need only consist of sending a demand letter to the alleged slamming carrier. Unless the alleged slamming carrier submits some proof of verification in accordance with the FCC's requirements, no further investigation will ever be needed. Even if the carrier submits proof that the carrier change was not only authorized, but also verified pursuant to the FCC's rules, then the authorized carrier will only have to examine that evidence and determine whether the verification does indeed conform to the FCC's rules. In some cases, it will be necessary to call the customer as part of the investigation.⁷ It would be foolhardy for any authorized carrier to just summarily reject evidence that a carrier change was verified in accordance with the Commission's rules because the Commission specifically states in Paragraph 42 of the Slamming Order that if either the subscriber or the carrier making the claim (the alleged slamming carrier) believes that the determination is wrong, it has the option of filing a section 208 complaint. If an authorized carrier made a decision that could not be justified on the basis of the evidence submitted by the alleged slamming carrier, that authorized carrier could incur liability for any damages suffered by the alleged slamming carrier as a result of that decision. Thus, while the procedure of having the authorized carrier make the slamming determination may not appear to be completely unbiased, in reality the threat of liability for a wrong decision should provide a strong deterrent to any decision that a slam occurred unless the evidence supports that decision.

AT&T claims that the crediting process outlined in the rules is burdensome and that the administrative systems required for this mechanism to function do not now exist. AT&T conveniently ignores the fact that §258 of the statute specifies that the slamming

⁶ AT&T Corporation's Petition for Partial Reconsideration or in the Alternative, for Clarification, pp 6-7.

⁷ This is the exact same procedure outlined in the TPA ad there is very little, if any, opportunity for bias in favor of the customer to sway the final slamming determination.

carrier will be liable to the authorized carrier in the amount of any money collected from the subscriber as a result of the slam. In addition, the legislative history for that section indicates that it was intended that the authorized carrier make the subscriber whole.⁸ All the FCC has done is propound rules to implement the statute in accordance with the legislative intent.

It is true that actually re-rating the slamming carrier's bill to apply the authorized carrier's charges for the exact same calls, especially where specialized calling plans are involved, is an expensive and time consuming process. However, in the Joint Petition⁹ (AT&T is one of the Joint Petitioners) the proposal is made that the authorized carriers merely refund one-half of the amount paid and totally avoid the re-rating requirement. So long as the customer does not pay more than it otherwise would have paid, absent the slam, the rules have been satisfied without any time-consuming re-rating of the bill. Thus, if the procedure of refunding half the amount paid, (as proposed by AT&T and the other Joint Petitioners), is used, then there will be no need for the establishment of any administrative systems required to re-rate bills. The refund to the customer could direct the customer to call, if the customer believed the refund to be less than the amount required to place the customer in the same position it would have been absent the slam, and the adjustment would be given further review. Carriers can, therefore, comply with the rules as written without the establishment of any new electronic interfaces or administrative systems to re-rate bills and issue refunds.

III. ADMINISTRATION OF CARRIER CHANGES AND FREEZES

AT&T argues that LECs should be required to accept carrier freeze requests from IXCs with proper verification. Such proposal is impractical and not in the best interest of

⁸ See H.R. Rep. No. 458, 104th Cong., 2d Sess. at CR 136 (1996).

⁹ Joint Petition for Waiver filed by AT&T Corporation, Sprint Corporation, MCI Worldcom, Inc., and Competitive Telecommunications Association in CC Docket 94-129 on March 30, 1999.

subscribers. The PIC freeze rules require that certain disclosures be made to subscribers as a part of any PIC freeze solicitation. If IXCs were to be permitted to take orders from customers to implement a PIC freeze on customer lines, those IXCs would have to explain to the customer what services could be subject to the freeze, when the freeze would become effective, how the freeze could be lifted, and the LEC charges, if any, associated with the freeze.¹⁰ Further, the IXC would have to be prepared to make such disclosures for each and every LEC that offers freezes. Since only a facilities-based LEC can implement and administer a freeze, it is more reasonable that those carriers provide the disclosures directly to subscribers about how PIC freezes and answer any questions subscribers have about those disclosures.

Further, as has been the case with verification requirements for carrier change orders, some carriers would ignore the verification requirements for PIC freezes unless there were substantial penalties for violations and a likelihood that the violations would be discovered quickly. With carrier change orders, it is likely that such failure is going to be discovered and the carrier change refuted as a slam. With freeze requests submitted electronically, along with a valid carrier change order, it could very well be months or years before the customer would ever discover that a freeze had been placed on its account without proper authorization. The customer would not be likely to discover the unauthorized freeze until it next attempted to change carriers. By that time, the customer might not even remember whether it had or had not authorized a freeze along with the carrier change. While unauthorized freezes do not create the havoc that unauthorized carrier change orders cause, customers who realize that someone made a change to their telephone service without their authorization will still resent that action and, in the absence of proof as to how the change occurred will blame their LEC.

¹⁰ Rule 64.1190(d) recognizes that there may be LEC charges for freezes.

It was also suggested that carrier changes and freezes should be verified together and that the Commission should order LECs to establish some automated method of accepting requests for lifting freezes and for implementing freezes. However, freezes are not inextricably intertwined with a carrier change order such that a freeze must be implemented in order for the change order to be worked properly. Therefore, if an LOA is the verification method being used, the requirement for two separate documents with two separate signatures sends a clear signal to the customer that the customer is authorizing two separate transactions in regard to its service. Combining the two separate functions in a single letter of agency seems to suggest that the two are co-dependent, that the freeze is somehow needed to complete the carrier change or vice versa. Thus, the Commission's "separate authorization" requirement seems a reasonable subscriber protection requirement.

SBC does not oppose multiple verifications being handled on a single third party verification call, so long as each verification is handled separately. However, SBC does object to being required to take orders for implementation of freezes from other carriers for all of the reasons discussed above. Likewise, SBC even more strenuously objects to being required to implement some sort of automated carrier freeze lifting system. Allowing carriers to transmit change orders to lift freezes completely destroys the protective effect of a freeze. Freezes are placed on a customer's line to prevent unauthorized carrier changes being submitted to change the customer's carrier without authorization. Carriers that ignore the rules and submit unauthorized change orders would also submit unauthorized orders to lift freezes. If LECs are ordered to accept PIC freeze orders from carriers, it will destroy the whole PIC freeze concept. There would be no reason for LECs to continue PIC freeze programs that could so easily be rendered ineffective by unscrupulous carriers.

SBC also objects to such a request because establishment of any automated system involves substantial cost. IXC's are very quick to suggest that ILEC's establish

systems to handle tasks that will benefit their business plan, but are very reluctant to take on even minimal switch programming activity, such as would be required for “un-PICing” a customer, for example, on their own networks. Sprint even argues in its Petition for Reconsideration in this docket that the LECs should have modified their internal systems to readily identify that a customer’s preferred carrier is a switchless reseller, instead of the reseller’s underlying facilities-based carrier,¹¹ again looking to the LEC to modify its systems to solve industry problems. The IXC assumption is always that the LECs should incur the cost to fix industry problems, without any regard to the costs and operating burdens thereby placed on the LEC industry.

SBC further objects to the requirement for an automated system because there would be no way for SBC representatives to positively verify that the subscriber initiated the request that the freeze be lifted, rather than a carrier with a slamming agenda initiating that request. The primary purpose of the slamming rules is to eliminate slamming. Properly authorized freezes play an important role in the achievement of that purpose. The integrity of this safeguard must not be jeopardized by removing the consumer from the process. The establishment of an automated system to lift freezes would defeat the purpose of PIC freezes.

Likewise, AT&T's request that LECs be required to provide automated access to freeze information and provide IXCs with lists of frozen accounts would involve additional cost to those LECs, without any commensurate benefit to subscribers or to the LECs. With the establishment of the three-way calls, the Commission has provided a simple means of determining whether a freeze exists and getting it lifted, if it exists, on a single call. Any requirement that LECs provide a list of customers with freezes simply provides a blueprint for those carriers that make slamming a part of their business plan, so that they can engage in slamming in a much more efficient manner.

¹¹ Sprint Petition for Reconsideration, p 2.

IV. VERIFICATION REQUIREMENTS

AT&T seeks clarification that a single check can serve the LOA for preferred carrier changes for multiple services. AT&T suggests that a statement of the separate services covered should be adequate to identify each service being switched. SBC does not oppose the clarification that a single check can provide the incentive for a customer to change more than one service. The fact that a check is being used as the LOA, however, should not excuse the carrier issuing the check from the obligation to make disclosures required for a valid LOA. For example, the mere notation at the top of a check that "Signing, cashing, and/or depositing of this check will switch to AT&T your long distance and your local toll service," is not adequate under the rules. Such language standing alone does not explain to the subscriber that "only one telecommunications carrier may be designated as the subscriber's interstate or interLATA preferred interexchange carrier for any one telephone number," as required in §64.1160(e)(4), nor does that language warn the subscriber that a charge may be applied to the customer's account for the change of carrier, as required by §64.1160(e)(5). All of those disclosures must be included on the check/LOA in type of sufficient size as to be readable. Carriers that choose to use checks as incentives should not be allowed to bootstrap a limited exception to the "sole purpose" requirement into a blanket exemption from the other requirements of §64.1160(e).

AT&T seeks clarification that LECs must verify IXC orders received directly from customers where the customer requests the LEC as its IXC. Such clarification is not reasonable. Third party verification and/or the collection and retention of LOAs is a costly process. That process is justified where there is a serious problem that must be resolved, such as the existing slamming problem. There is no demonstrated problem resulting from customers calling a LEC to order service. For that reason, there is no justification at this point for a legal requirement for verification when the customer calls a LEC for new service. The imposition of the additional cost of verifying those directly-

communicated customer choices, with the resulting costs being eventually passed on to telephone service consumers in some form or another, is unreasonable unless and until an actual need for such verification has been established. Such overkill brings to mind the old axiom, "if it ain't broke, don't fix it." There has been no indication that the LEC customer service ordering process is broken; there is, therefore, no justification for an expensive "fix" for that non-existent problem.

V. NOTICE

SBC does believe that clarification is needed as to how the slamming carrier is to receive notice of the alleged slam. However, there is really only a need for clarification in the situation where the customer has not yet paid any charges. In the situation where the customer has paid slamming charges, the rules provide for the authorized carrier to make demand upon the slamming carrier for proof of authorization or the money paid, together with removal of all additional charges from the subscriber's bill. All that is needed in that scenario is a clarification that, if the subscriber first reports the slam to a carrier other than the authorized carrier, the other carrier should direct the customer to call its authorized carrier.

In the scenario where the customer has not yet paid any charges, however, there is no provision in the rules for the slamming carrier to get notice of the alleged slam. In such situations, the rules should also be clarified to require that the first carrier called by the customer should direct the customer to its authorized carrier, so that the authorized carrier can again provide notice to the alleged slamming carrier.

VI. CONCLUSION

The only way to stop slamming is to take the profit out of slamming. Congress recognized that the Commission would have to draft its Rules to implement the Act. The various TPA proposals are simply ploys to circumvent deterrents to slamming until a waiver is granted to shield the IXCs from the business uncertainty of slamming liability

under the rules. Until those rules are allowed to go into effect, slamming will continue to be a profitable business. SBC continues to support the FCC's Order and recommends that the notice problem be cured in the Order on Reconsideration, so that the slamming rules can be allowed to take effect as soon as possible.

Respectfully Submitted,

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June 23, 1999

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing "Response of SBC Communications Inc. to Petitions for Reconsideration" in CC Docket No. 94-129 has been served on June 23, 1999 to the Parties of Record.

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