

RECEIVED

NOV 3 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, DC

|                                    |   |                             |
|------------------------------------|---|-----------------------------|
| In the Matter of                   | ) |                             |
|                                    | ) |                             |
| Application by Verizon for         | ) | CC Docket No. <u>00-176</u> |
| Authorization Under Section 271 to | ) |                             |
| Provide Long Distance Service in   | ) |                             |
| Massachusetts                      | ) |                             |

Introduction

The National Consumers League supports the application of Verizon for authorization to provide long distance service in Massachusetts because we believe that increased competition will bring benefits to consumers and workers in the state. NCL is a private, nonprofit consumer advocacy organization founded in 1899 to identify, protect, represent and advance the economic and social interests of consumers and workers.

NCL works on a number of telecommunications issues, such as fair competition, truth-in-billing, and truth-in-advertising. In its public policy work and through its National Fraud Information Center, a toll-free hotline for consumers to get advice about telephone solicitations and report suspected telemarketing fraud, NCL has taken an active part in the fight against telephone slamming, cramming, and pay-per-call abuses. In addition, NCL uses the media and other methods of outreach, including its www.nclnet.org and www.fraud.org Web sites, to educate the public about how to get the most from the competitive telecommunications marketplace and how to avoid telephone-related fraud.

Benefits of Increased Competition

Increased competition drives companies to be more innovative in the services and products they offer and reduces prices. In New York, where Verizon has been offering long distance service for nearly a year, more than a million people have switched to that company's long distance plans, while another million have left the Verizon for other companies to provide their local telephone service. New Yorkers have taken advantage of their increased options and have reaped the benefits, with more pricing plans and lower costs, especially for low volume users. Verizon has met the checklist of requirements under the Telecommunications Act of 1996 and is ready to offer Massachusetts consumers the same benefits of competition in long distance service.

Consumer Protection

Verizon understands the importance of protecting consumers from fraud and abuse in the competitive telecommunications marketplace. In 1998, when NCL identified the "cramming" of unauthorized third-party charges for optional services on consumers' phone bills, Verizon (then Bell Atlantic) was one of the leaders in working with other local telephone companies, billing aggregators, and the Federal Communications Commission to develop guidelines for billing that

No. of Copies rec'd 0  
List ABCDE

have significantly reduced the incidence of cramming. As the billing agent for other long distance companies, Verizon has also been active in discussions at the FCC, the Federal Trade Commission and other fora about how to curb telephone slamming and pay-per-call abuses.

Verizon also understands that public education is an important weapon against fraud, and that informed consumers are better able to make informed choices in the competitive marketplace. NCL and Verizon have worked together to educate the public by creating a new section on NCL's Web site, "Understanding Your Phone Bill," which explains the common charges found on telephone bills, describes phone-related fraud and how to avoid it, and provides advice about shopping for telecommunications services. Verizon is also an active member of the Alliance Against Fraud in Telemarketing and Electronic Commerce, a coalition of government, consumer advocacy, labor, and business representatives. Coordinated by NCL, the mission of the alliance is to combat telemarketing and Internet fraud and help consumers shop by telephone and online safely through public education.

In addition, Verizon is one of the few telecommunications companies that seeks input through a board of consumer representatives. Verizon's Consumer Advisory Board, a self-governing body that sets its own guidelines and agendas, plays a strong role in advising the company on a wide range of consumer issues. Its members, consumer advocates from across the nation, have the ear of company officials at the highest levels and have a significant impact on company policies concerning privacy, slamming, truth-in-billing and other important matters.

#### Benefits to Workers

NCL has always recognized the link between good products and services and good working conditions. As a unionized company, Verizon provides employees with good wages and other benefits. NCL expects that as the company expands it will continue to retain its skilled, unionized employee base. For Massachusetts consumers who are concerned about labor issues, the entry of Verizon into the long distance market will give them another choice for a unionized service provider.

#### Conclusion

NCL is confident that Verizon is committed to providing quality service, consumer protection, and good jobs in Massachusetts. Therefore, NCL urges the FCC to approve Verizon's application to provide long distance service in that state.

Respectfully submitted,

November 3, 2000



Susan Grant, Vice President for Public Policy  
National Consumers League  
1701 K Street NW, Suite 1200  
Washington, DC 20006  
(202) 835-3323