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June 20, 2002

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Inquiry Concerning a Review of the Equal Access and Nondiscrimination
Obligations Applicable to Local Exchange Carriers, CC Docket No. 02-39

Dear Ms. Dortch:

Yesterday afternoon, Martha Marcus, Lynn Crofton, Jackie Von Schmidt, Sue Landerman and I from AT&T, Karen Reidy from WorldCom, Sue McNeil and Lil Taylor from Sprint and by phone, Betty Tavidan, Scott Beer & Carol Sawyer-Aguilar from WorldCom and Carol Wohlrab from AT&T met with Kim Cook, Ann Stevans, Julie Veach and Gail Cohen from Competition Policy Division of the Wireline Competition Bureau and Margaret Egler from Consumer and Governmental Affairs Bureau to discuss the topic of mandatory minimum CARE (Customer Account Record Exchange) standards in the above-referenced proceedings.

The attachment, which was handed out at the meeting, provided the details of the discussion.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Del Casino".

cc: Kim Cook
Ann Stevans
Julie Veach
Gail Cohen

We CARE . . .
The Need for Mandatory
Minimum CARE
Standards

Joint Presentation to FCC by AT&T, WorldCom and Sprint
June 19, 2002

Agenda

- Meeting Goals
- Background
- Problem
- The Impact
- Introduction to Process Flow Scenarios
- Recommendation

Meeting Goals

- Provide a brief analysis of an on-going industry problem which causes significant consumer confusion and complaints.
- Obtain FCC assistance in implementing proposed solutions to reduce complaints and improve consumers' experience.

Background

- CARE is a system of codes developed and maintained by the Ordering and Billing Forum (“OBF”) Subscription Committee . . . an industry workgroup that develops non-binding industry guidelines . . . that facilitate exchange of critical customer provisioning and billing information between carriers.
- CARE data is essential to:
 - ◆ establish a customer account
 - ◆ bill accurately
 - ◆ execute and confirm customer orders and transfers from one carrier to another
 - ◆ avoid inadvertent “continued billing,” or violation of Truth-In-Billing regulations, and customer’s misperception of “cramming and slamming.”

Problem: Lack of Mandatory or Insufficient Minimum CARE Standards

- At present, participation in this process is ***not*** regulated or mandated. Industry-wide participation does not currently exist.
- While standards have been adopted by some companies, they have not been adopted and implemented uniformly, which causes untimely or incorrect processing.
- At present, there is ***no*** other ***reliable*** alternative for a carrier to receive timely, accurate and reliable data regarding a customer's billing information. ILECs' exercise monopoly bargaining power over quality and liability terms of the information they provide to IXC's.
- In many cases there is ***no reliable*** way for an IXC to identify the local exchange company or the customer who was placed on the IXC network by the LEC. Therefore, there is no way to request Billing Name and Address ("BNA"). Often the ILEC has this information but is not allowed to or chooses not to share this data.

The Impact

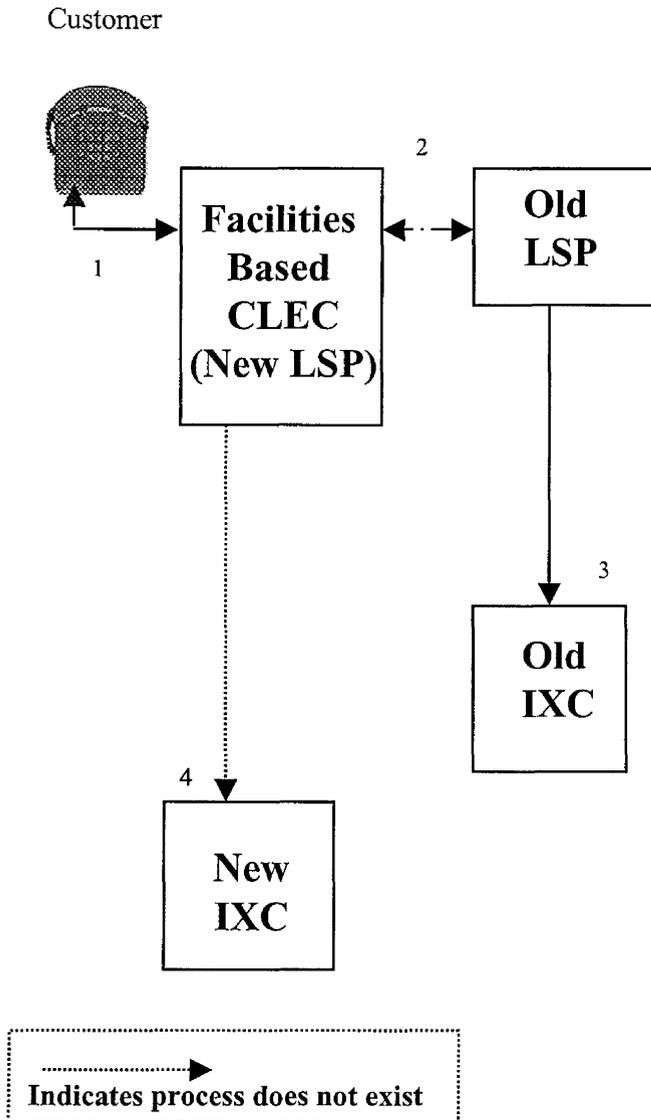
- Consumer confusion, service delays, billing problems and complaints.
- Increase in number of FCC inquiries and complaints.
- Carriers not able to bill consumers for services rendered.

Introduction to Process Flow Scenarios

- We are providing four of the more common scenarios of customer information flow between carriers:
 1. Facilities Based Local Service Provider (LSP) does not support CARE and Old LSP supports CARE
 2. Old LSP does not support CARE and New LSP supports CARE
 3. Reselling LSP does not support CARE and Network Service Provider supports CARE
 4. Facilities Based LSP does not support CARE and Old LSP supports CARE

Scenario No. 1

Customer Changes Local and Long Distance Service Providers Facilities Based LSP does not support CARE and Old LSP supports CARE



1. Customer contacts Facilities Based CLEC (New LSP) to change local and long distance service providers.
2. New LSP may communicate with Old LSP as appropriate via Local Service Ordering Guidelines. No CARE involved.
3. Old LSP informs Old IXC that the customer is changing his LSP. Old LSP does not always share with Old IXC the name of the New LSP.
4. *New LSP provisions switch for customer's choice of New IXC. However, New IXC is never informed that customer has chosen it as his long distance service provider. Old IXC is not informed that customer has chosen a different long distance service provider.*

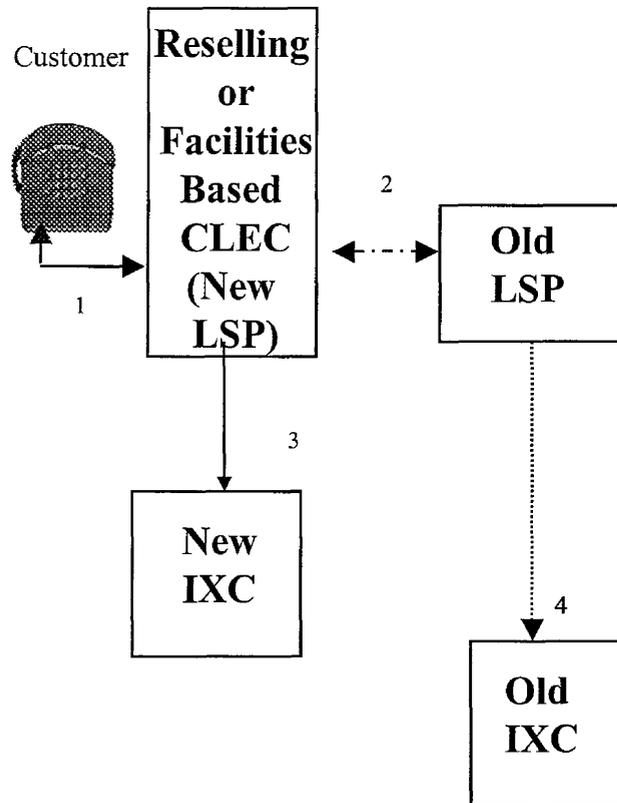
Potential Customer Impacts:

- Customer may continue to receive an invoice for monthly recurring charges from Old IXC that can be remedied by either the executing carrier sending a disconnect order or, in the case of some IXCs, the customer contacting the Old IXC to cancel service.
- Customer will be able to make long distance calls on the New IXC network but may not receive an invoice. The New IXC has no account established for the customer but will receive network usage. There is currently no reliable capability for the New IXC to identify the New LSP thus there is no way for the New IXC to obtain BNA for the new customer.
- As a result of no receipt of CARE by the New IXC, the New IXC may place a network block on customer line, bill the customer at an incorrect rate or not bill them at all.
- Customer may be required to make numerous calls to carrier(s) to resolve potential billing problems.

Scenario No. 2

Customer Changes Local and Long Distance Service Providers

Old LSP does not support CARE and New LSP supports CARE



1. Customer contacts Reselling or Facilities-based CLEC (New LSP) to change local and long distance service providers.
2. New LSP may communicate with Old LSP via Local Service Ordering Guidelines as appropriate. No CARE involved.
3. New LSP informs New IXC of customer choice for their long distance service provider. (inPIC)
4. *Old IXC is never informed that customer has chosen a different long distance service provider.*

Potential Customer Impacts:

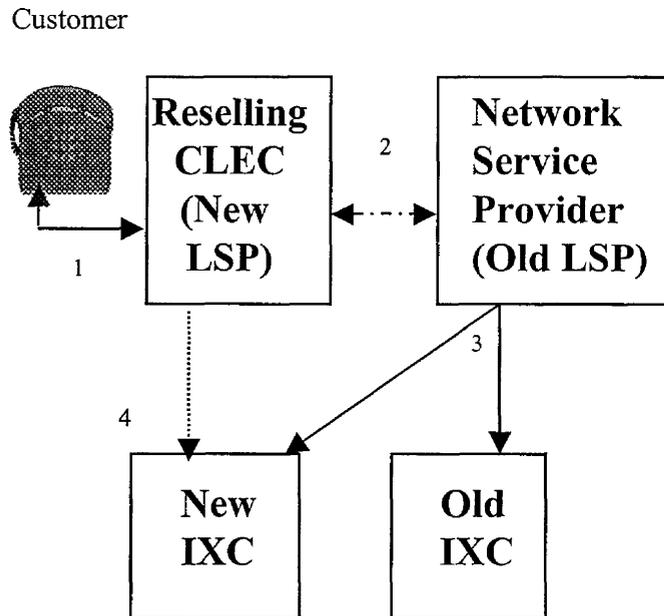
- Customer may continue to receive an invoice for monthly recurring charges from Old IXC that can be remedied by either the executing carrier sending a disconnect order or, in the case of some IXCs, the customer contacting the Old IXC to cancel service.
- Customer may be required to make numerous calls to carrier(s) to resolve potential billing problems.

Indicates process does not exist

Scenario No. 3

Customer Changes Local and Long Distance Service Providers

Reselling LSP does not support CARE and Network Service Provider supports CARE



1. Customer contacts Reselling CLEC (New LSP) to change local and long distance service providers.
2. New LSP may communicate with Network Service Provider (Old LSP) via Local Service Ordering Guidelines as appropriate. No CARE involved.
3. Old LSP may send “advisory” to New & Old IXC that the switch reflects an update in the long distance (IXC) choice for the customer. Data from the Old LSP does not contain customer BNA necessary to establish an account and bill customer accurately.
4. *No communication from New LSP to New IXC providing: (1) customer’s choice of long distance service provider, (2) BNA, or (3) CARE. There is no industry support for a national line level database.*

Potential Customer Impacts:

- Customer may continue to receive an invoice for monthly recurring charges from Old IXC that can be remedied by either the executing carrier sending a disconnect order or, in the case of some IXCs, the customer contacting the Old IXC to cancel service.
- Customer will be able to make long distance calls on New IXC network but may not receive an invoice. The New IXC has no account established for the customer but will receive network usage. There is currently no reliable capability for the New IXC to identify the New LSP thus there is no way for the New IXC to obtain BNA for the new customer.
- As a result of no receipt of CARE by New IXC, the New IXC may place a network block on customer line, bill the customer at an incorrect rate or not bill them at all.
- Customer may be required to make numerous calls to carrier(s) to resolve potential billing problems.

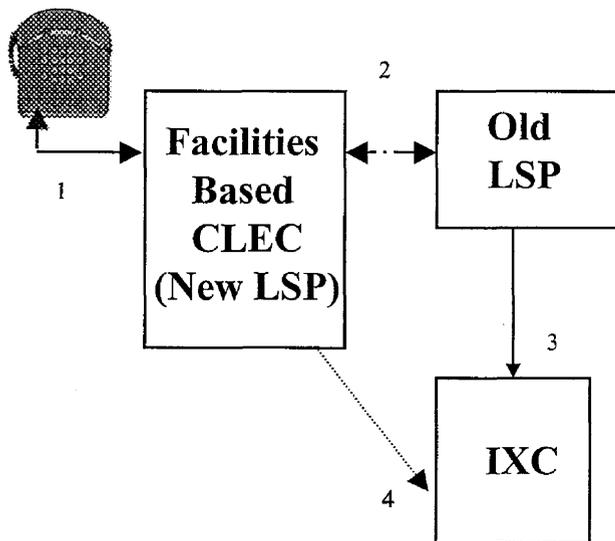
Indicates process does not exist

Scenario No. 4

Customer Changes Local Service Provider Only

Facilities Based LSP does not support CARE and Old LSP does support CARE

Customer



1. Customer contacts Facilities Based CLEC (New LSP) to change local service provider.
2. New LSP may communicate with Old LSP via Local Service Ordering Guidelines as appropriate. No CARE involved.
3. Old LSP informs IXC there is a change in the Local Service Provider. (outPLOC) Old LSP does not always share with IXC the name of the New LSP.
4. *There is no confirmation from New LSP that customer has retained or changed long distance service provider.*

Potential Customer Impacts:

- Based on notice of migration in local service, lack of notification from New LSP regarding customer's choice in IXC, and lack of usage, IXC may assume customer switched IXC. Some IXCs may subsequently close the customer's account.
- As a result, customer may lose Optional Calling Plan. If usage on IXC network begins from this "closed" customer account, a new account will be established as a "basic rate customer" until the customer calls the IXC to choose an optional calling plan.
- Customer may be required to make numerous calls to carrier(s) to resolve potential billing problems.

Indicates process does not exist

Recommendation

- **Issue an NPRM for Mandatory Minimum CARE Standards**