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April 11, 2003

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

Re: CG Docket No. 02-386

Dear Ms. Dortch:

On April 9, Martha Marcus, Lynn Crofton and I from AT&T, Karen Reidy from WorldCom, Mike Fingerhut and Lil Taylor from Sprint and by phone, Betty Tavidan and Scott Beer from WorldCom, Jackie Von Schmidt, Carol Wohlrab and Sue Landerman from AT&T met with Margaret Egler, Perlesta Hollings and Alexis Johns 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: Margaret Egler
Perlesta Hollings
Alexis Johns

MANDATORY MINIMUM CARE STANDARDS

**Joint Presentation to the
FCC by
AT&T, Sprint and WorldCom
April 9, 2003**

Meeting Goals

- Minimum CARE - Benefits Revisited
- Minimum CARE Petition vs. Americatel Petition
- Commission Action

Why Commission Action Necessary

- Current OBF process is voluntary
 - All industry participants must also participate in LEC-IXC communication to achieve consumer satisfaction
- The Joint Minimum CARE Petition is intended to **mandate** a subset of the current industry standard for all LECs/IXCs

Importance of Mandatory Minimum CARE

- Solves substantial portion of current industry billing problems
 - Through a sampling process, the joint petitioners determined that 40% to 60% of overall consumer complaints concerning billing errors would be eliminated
- Minimum CARE connect, disconnect and change records are essential elements for accurate customer billing
- Minimum CARE enables IXC's to accurately maintain presubscribed customer accounts and perform customer account maintenance activities for presubscribed customers
 - Also, enables IXC's to request BNA for non-presubscribed users when the identity of the line provider can be determined

Minimum CARE Does Not Create Significant Burdens

- **Minimum CARE communications need not be automated, universal mechanization is not required**
 - Cost of Minimum CARE can be minimized through use of a web interface or paper and the U.S. Mail
 - 50% of the CLECs/ILECs that currently provide CARE do so on paper using the U.S. Mail or a FAX machine
 - Vendors are available to provide CARE services at little to no cost. When CLECs meet certain processing thresholds, some vendors are providing CARE services at no cost to the CLEC.
- **All companies incur a cost in this communications process in the best interest of our mutual customers**
- **CARE is currently provided via**
 - Paper delivered by U.S. Mail or Fax
 - Cartridge tape
 - File Transfer Protocol ("FTP")
 - Network Data Mover ("NDM")
 - E-mail
 - Electronic bonding/Electronic communication

Remaining Issues

- IXC needs to know which company (line provider) to send the BNA request and a PIC request
 - IXCs cannot identify the line provider in certain circumstances, such as when the provider is a reseller or switchless provider
- Billing problems associated with:
 - Casual Calling/Dial Around
 - Collect
 - Bill to Third Party
- Customers with these calling patterns will continue to be negatively impacted when network access is denied whenever the IXC cannot accurately identify the end user

Americatel's Petition

- **Americatel, an IXC providing dial-around services, proposes mandatory BNA from all carriers, including CLECs.**
 - BNA can only be obtained or requested when the line provider is known
- **National Line Level Database ("NLLD") Proposal**
 - Solves line provider identity problems
 - Solves billing problems associated with dial around, collect and bill-to-third calls
 - Industry investigation over a period of six years
 - Technical specifications identified
 - Vendor solution not implemented
 - This is a complex issue that merits further evaluation

Next Steps

- **FCC action in implementing Mandatory Minimum CARE standards**
 - will immediately improve customer account maintenance problems, and reduce billing-related complaints for presubscribed customers
- **Continue exploration of solutions to address the remaining issues independent of Mandatory Minimum CARE**

Recommendation

- Issue a Notice of Proposed Rulemaking for Mandatory Minimum CARE Standards
- Subsequently, consider a Further Notice of Proposed Rulemaking for resolution of the remaining issues