

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

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

COMMENTS OF VERIZON

The Commission's Second Further Notice seeks comments on whether the Commission's regulations should be more prescriptive concerning the words that must be used to verify carrier-change orders. While two of the proposed additions make sense, the rest are, at best, unnecessary or, in some cases, affirmatively harmful.

The Proposed Changes

Two of the proposals in the Notice have merit:

The Commission correctly recognizes that verification records should be dated,¹ and it should require the dating of these records. It should not, however, prescribe the dating technique, as proposed in the Notice.² Verizon requires its third-party verifiers to electronically date-stamp verification tapes, which is more reliable than merely having the verifier state the date in the

¹ *Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996/Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers*, 18 FCC Rcd. 5099, ¶ 111 (2003) ("Notice").

² The Notice proposes that "third party verifiers should state the date during the taped verification process." Notice ¶ 111.

course of his conversation with the consumer. Any dating requirement that the Commission adopts should permit techniques other than oral dating by the verifier.

The Notice also correctly recognizes that some telemarketers do not make it clear that what they are selling is a carrier change. Instead of being clear on this point, the Commission has found that the telemarketer offers and the verifier verifies “an ‘upgrade’ of the customers’ service or ... bill consolidation.”³ For this reason, “verifiers should be required to make clear to a customer that he or she is not verifying an intention to retain an existing service, but is in fact asking for a carrier change,” as the Notice proposes.⁴

The other proposals in the Notice should be rejected:

The Commission asks “whether each piece of information that a third party verifier must gather under our rules should be the subject of a separate and distinct third party inquiry and subscriber response.”⁵ Section 64.1120(c)(3)(iii) requires verification to elicit six pieces of information.⁶ Some of these questions can easily and logically be grouped together,⁷ making the verification process less time consuming for the customer. Prohibiting verification in this way would not be in the public interest. It would be even worse to require separate questions and answers for each telephone number and each service being changed, a requirement that would annoy consumers and unnecessarily lengthen the verification process. A customer wanting to

³ Notice ¶ 113.

⁴ Notice ¶ 113.

⁵ Notice ¶ 113.

⁶ “[T]he identity of the subscriber; confirmation that the person on the call is authorized to make the carrier change; confirmation that the person on the call wants to make the carrier change; the names of the carriers affected by the change; the telephone numbers to be switched; and the types of service involved.”

⁷ For example, “Your name is _____, and you are authorized to change the carrier on [this number].”

change toll provider (both inter- and intraLATA) on her two lines would have to go through this six-step litany four times, answering a total of 24 separate questions. The Commission should not mandate such a procedure.

The Notice asks “whether the verifier should explicitly state that, if the customer has additional questions for the carrier’s sales representative regarding the carrier change after the verification has begun, the verification will be terminated, and further verification proceedings will not be carried out until after the customer has finished speaking with the sales representative.”⁸ The answer is that the Commission should not require that verification be terminated, but should allow the customer to proceed with the verification process if she chooses to do so. This approach puts the customer in control — if she is unsure enough that she wants to stop the order-verification process she can do so; if not, she can continue. The proposal in the Notice would take control out of the customer’s hands. Giving the customer this flexibility is especially important when dealing with carriers, like Verizon, whose service reps drop off the line once the verifier has picked up the call. The Commission’s proposal would require the customer to hang up and call back to the carrier service center, where she would have to start from the beginning again — verifying her identity and placing her order — while also asking her question. The customer would then have to wait for the call to be transferred to the verifier and to go through the whole verification script all over again. The more customer-friendly approach would be to allow the first verification to complete; if getting her question answered caused the customer to want to make a change, she could do so, but if that answer merely confirmed her initial decision, then she would not have to go through the whole order-verification process all over again.

⁸ Notice ¶ 112.

The Commission should not require that, when verifying an interLATA service change, the verifier should “specify that the interLATA service encompasses both the international and state-to-state calls, and ... define the terms ‘intraLATA toll’ and ‘interLATA toll’ service.”⁹ The first requirement seems unnecessary and the second affirmatively harmful. There is no reason to believe that customers asked to verify their change of “long distance” provider would not understand that “long distance” includes international — what could be more “long distance” than international calling after all. Requiring verifiers to use the terms “interLATA toll” and “intraLATA toll” and then define them would serve no purpose and would only baffle consumers. Since LATAs were created 20 years ago, the industry has found ways to convey the difference between interLATA and intraLATA without having to explain exactly what a “local access and transport area” is. While some confusion is inevitable — there is nothing logical or obvious about LATAs or where the boundaries are — consumers generally get it. Interjecting new requirements into the verification process would not eliminate this natural confusion that LATAs cause and would only make the process more cumbersome and complex.

Finally, the Notice seeks “comment on whether the verifier should convey to the customer that the carrier change can be effectuated without any further contact with the customer once the verification has been completed in full.”¹⁰ This is unnecessary, as that is exactly what the consumer would expect anyway. She has just spoken, probably at length, to a representative of the carrier and then gone through what many find to be a lengthy and redundant verification process. After all that, the typical consumer would *hope* to be done with the process — that there would be nothing more that she would have to do to get her order processed. Requiring that this

⁹ Notice ¶ 113.

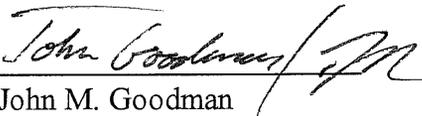
¹⁰ Notice ¶ 112.

be said explicitly serves no purpose and artificially adds to the time it takes consumers to change carriers.

Conclusion

The only new verification requirements that should be adopted are date stamping, which the Commission should allow flexibility in implementing, and stating that the order being verified will result in a carrier change.

Respectfully submitted,


John M. Goodman

Attorney for the Verizon
telephone companies

1300 I Street, N.W.
Washington, D.C. 20005
(202) 515-2563
john.m.goodman@verizon.com

Michael E. Glover
Edward Shakin
Of Counsel

Dated: June 2, 2003