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February 4, 2004

VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW
Washington, DC 20554

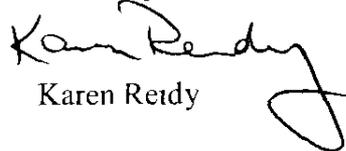
Re **Notice of Ex Parte Presentation, CG Docket No. 02-386**

Dear Ms. Dortch:

On Wednesday February 4, 2004, Michael Fingerhut from Sprint, Michael Del Casino from AT&T and I met with Johanna Mikes Shelton, Legal Advisor, and Anne Perkins, Special Assistant, of Commissioner Adelstein's office, to discuss the above-referenced proceeding. The attached presentation, which was provided during the meeting, formed the basis of our discussion. Additionally, I clarified that the joint petitioners believe that a sufficient record was developed in the comment cycle thus far in this proceeding to allow the Commission to reach tentative conclusions.

Pursuant to the Commission's rules, this notice is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,


Karen Reidy

cc: J. Shelton w/o attachment
A. Perkins w/o attachment

Attachment

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Mandatory Minimum CARE Standards

Joint Presentation by
AT&T, MCI, and Sprint

CG Docket No. 02-386

February 4, 2004

What is CARE?

- CARE (Customer Account Record Exchange) is the industry standard for the exchange of critical customer information between carriers.
- For example, it is a process used to:
 - submit an end user PIC order;
 - confirm customer orders and transfers;
 - know when a local service provider has placed or removed an end user on the carrier's long distance network;
 - know who the local service provider has suspended or blocked from using the carrier's long distance network; and
 - receive notification of order failure (allowing the carrier to take corrective action and the customer to receive intended service).

Consumers Harmed By No CARE Requirements

- Lack of 100% participation in CARE causes *billing inaccuracies* and consumers believing they have been slammed/crammed.
 - Petitioners estimate that *40% to 60% of consumer billing complaints* result from insufficient CARE.
 - For example, the LSP's failure to notify an IXC that it has removed a consumer from the IXC's network results in the consumer continuing to receive bills from that IXC.
- Participation in the CARE process is *not regulated/mandated*.
 - Industry-wide participation does not exist.
 - Inconsistency among carriers causes confusion.
- There is *no reliable alternative*.

Solution: Mandatory Minimum CARE Standards

- Joint Petition requests that a small, but critical, subset of the current industry standard be mandated for all wireline carriers.
- The proposal includes:
 - Small subset of CARE codes concerning PIC selections, PIC removals, end user disconnects, and essential end user account maintenance activity;
 - Process to ensure timely, accurate, and complete exchange of this data; and
 - Recovery process to remedy incomplete or inaccurate CARE data.

Anticipated Impact: Consumers Benefit

- Substantial reduction in consumer complaints.
- Anticipated reduction in complaints will be realized only upon 100% participation in mandatory minimum CARE process by all industry participants.

Recommendation

- Issue a Notice of Proposed Rulemaking for industry-wide, mandatory minimum CARE standards.