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September 10, 2004

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

Re: Docket CG 02-386

Dear Ms. Dortch:

Yesterday Afternoon , Karen Reidy from MCI, Mike Fingerhut, Lil Taylor and Cathy Cluaas from Sprint, Lynn Croften and I from AT&T and by phone, Sue Landerman, Jackie Von Schmidt and Tammy Wurdach from AT&T, Dave Thurman from Sprint and Betty Tavidian from MCI, met with Jay Keithley, Erica McMahon, Gene Fullano, Richard Smith and Lisa Boehley from Consumer and Govermental Affairs Bureau to discuss the above referenced proceeding.

The attachment, which was a handout at the meeting, provides the details of that discussion.

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

Sincerely,

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

cc: Jay Keithley
Erica McMahon
Gene Fullano
Richard Smith
Lisa Boehley

Mandatory Minimum CARE Proceeding

**AT&T, MCI and Sprint Ex Parte
Presentation**

CG Docket No. 02-386

September 9, 2004

Joint-Petitioner's Proposal

- Joint Petitioner's proposed a minimal, but essential, subset of the current industry CARE standard be mandated for all wireline carriers.
 - CARE (Customer Account Record Exchange) is the industry standard for the exchange of critical information between carriers, e.g. means to submit PIC change, confirm execution of orders, etc.
- Mandating the exchange of this information is essential.
 - Local exchange carriers are the only reliable source of PIC transaction information.
 - Current standard is voluntary.
 - Lack of 100% participation by all carriers results in billing inaccuracies and consumer believing they have been slammed/crammed.
- Proposal includes flexible transmission media and acceptable alternative codes.

Issues Raised in Comments

- The majority of comments support and demonstrate the need for Mandatory Minimum CARE standards.
 - Both State Commissions and carriers support FCC action.
- Minimum mandatory standards will not restrict evolution of CARE.
 - As example, the industry recently adopted a “Number Portability Indicator” to identify a telephone number which is porting to a wireless carrier.
- Joint Petitioners agree that ATIS/OBF is appropriate body for continued development of national CARE standards, but FCC adoption and enforcement is needed.
 - ATIS/OBF should provide recommendations as necessary to FCC for code and/or process revisions.
 - Many carriers will voluntarily expand on minimum requirements.

Issues Raised in Comments (Cont'd.)

- Rural Carriers Should Not Be Carved Out.
 - Universal participation is necessary to ensure customer protections.
 - Lack of local service competition does not eliminate need for CARE; IXC competition necessitates CARE.
- Performance Standards Are Important.
 - Current industry cooperation is not satisfactory.
 - Consumers, carriers, and government enforcement entities have experienced problems created by the lack of uniform CARE processing.
 - Customers expect their account data and execution of their request to be accurate, timely and complete.
- The Cost Issue
 - The costs of exchanging CARE are normal costs of doing business in an industry of interconnecting carriers; all interconnecting carriers must assume the costs of CARE.
 - Carriers should not be allowed to use cost to avoid the implementation of CARE when such avoidance harms consumers and damages competition.

“Wait and See Approach” is Inappropriate and Harms Consumers

- Billing problems are the current state of the industry and have harmed both consumers and carriers. Evidence of billing problems are reflected in consumer complaints.
- Leaving solutions to be determined by carriers without Federal mandate will not solve problems. Some carriers have limited incentive to provide critical customer data.