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September 15, 2004

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

Re: Docket CG 02-386

Dear Ms. Dortch,

Yesterday afternoon, Marybeth Banks and Dave Thurman from Sprint, Lynn Crofton, Jackie Von Schmidt and I from AT&T and by phone, Sue Landerman and Tammy Wurdach from AT&T, and Karen Reidy and Betty Tavidian from MCI, met with Jay Keithly, Erica McMahon, Richard Smith, Lisa Boehley, David Marks and Suzanne Perrin from the Consumer and Governmental 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 in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

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

Attachment

cc: Jay Keithly  
Erica McMahon  
Richard Smith  
Lisa Boehley  
David Marks  
Suzanne Perrin

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

**Joint Presentation to FCC by AT&T, MCI, and Sprint**  
**September 14, 2004**

# Agenda

- Meeting Goals
- Background
- Problem
- The Impact
- Introduction to Process Flow Scenarios
- Review of Appendices A and B to Joint Petitioners' Proposal
- Review Sample Paper Form of CARE
- Discuss NARUC Resolution
- Recommendation

# Meeting Goals

- Provide a brief analysis of an on-going industry problem which causes significant consumer confusion and complaints.
- Describe how Mandatory Minimum CARE would mitigate these challenges.
- 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 IXCs.
- 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

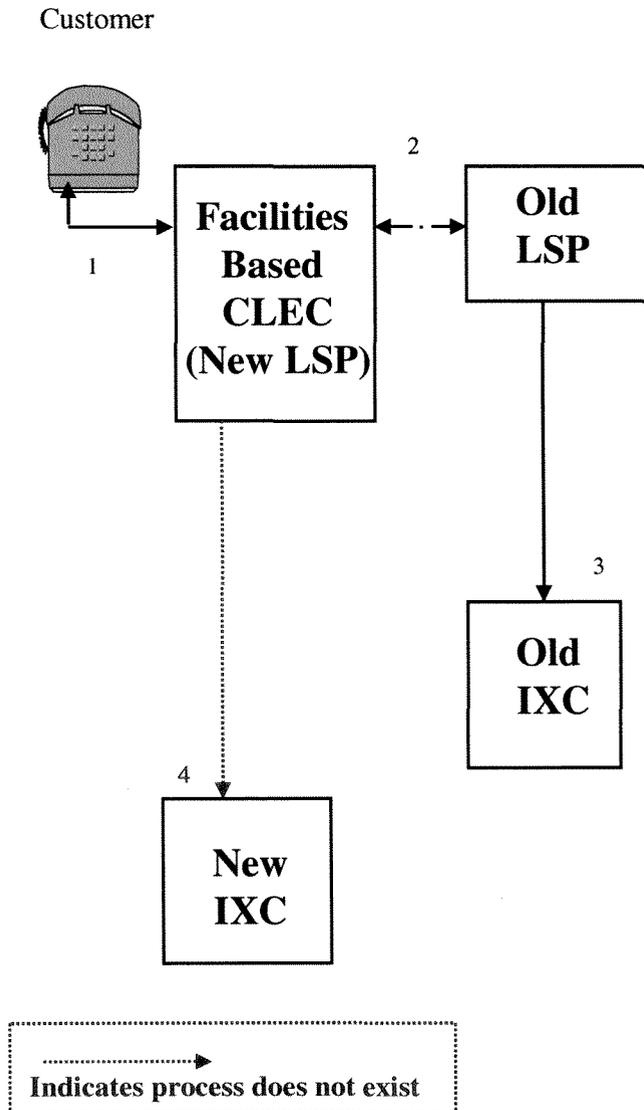
- Consumer confusion, service delays, billing problems and complaints.
- Increase in number of FCC inquiries and complaints.
- Carriers not able to bill consumers for services rendered.

# Introduction to Process Flow Scenarios

- We are providing three of the more common scenarios where customer's have been negatively impacted from the lack 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. Facilities Based LSP does not support CARE and Old LSP supports CARE
- We are also providing a Billing Name and Address (BNA) request scenario
  4. New LSP does not support 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. (2231, 2233, or 2234)
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. (2003 or 2008)*

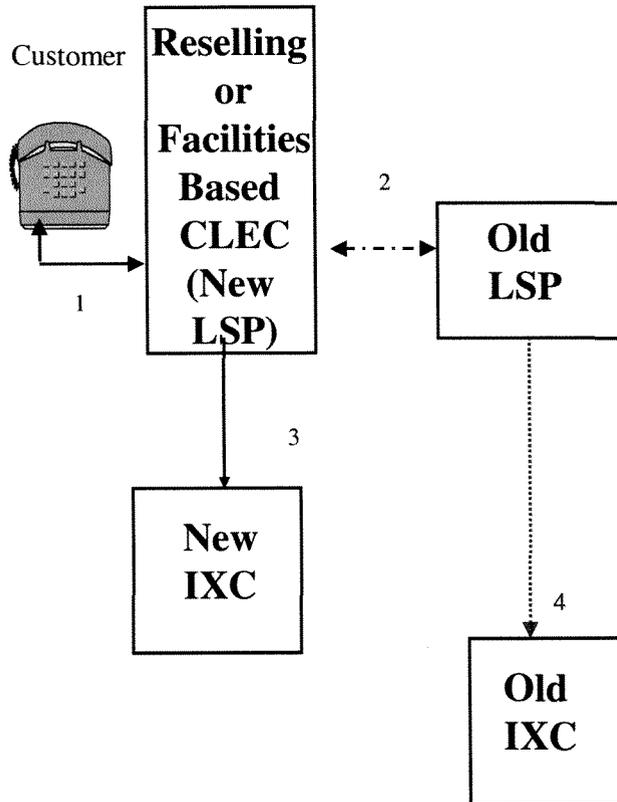
### Potential Customer Impacts:

- 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. (2003 or 2008)
4. *Old IXC is never informed that customer has chosen a different long distance service provider. (2231, 2233 or 2234)*

#### 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.

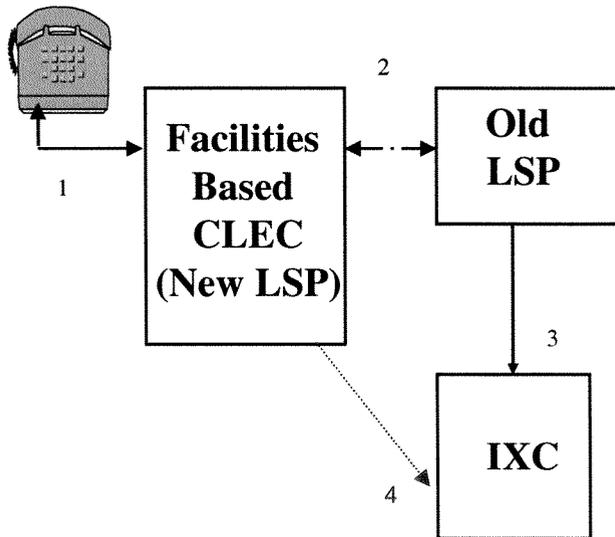
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Indicates process does not exist

# Scenario No. 3

## 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. Old LSP does not always share with IXC the name of the New LSP. (2231, 2233 or 2234)
4. *There is no confirmation from New LSP that customer has retained or changed long distance service provider. (2003 or 2008)*

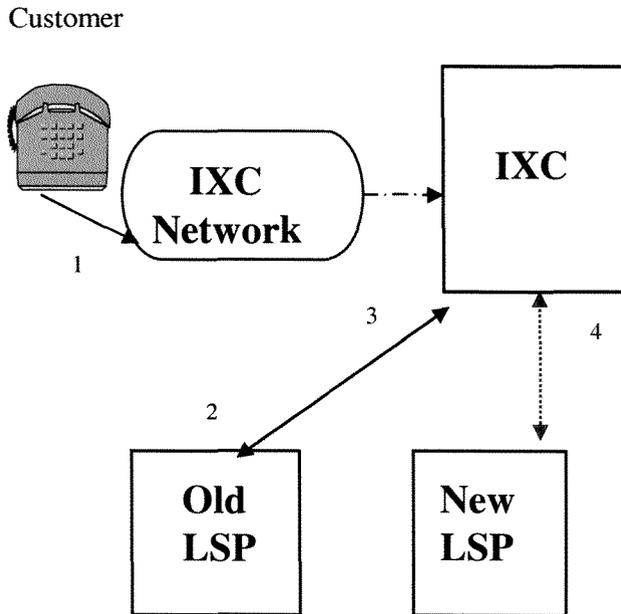
### Potential Customer Impacts:

- Based on notice of migration in local service, lack of notification from New LSP regarding customers 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

# Scenario No. 4

## Customer Uses IXC Network where IXC does not have account for Customer New LSP does not support CARE



1. Customer uses IXC network to make calls. Network usage sent to IXC billing database.
2. IXC sends LSP BNA request. (0501)
3. This LSP is no longer LSP for customer and rejects request. Data from the Old LSP does not contain customer BNA necessary to establish an account and bill customer accurately. (26xx)
4. *No communication from New LSP to New IXC providing customer's choice of long distance service provider so when the IXC incurs usage on their network they cannot identify the customer. There is no industry support for a national line level database; if the new LSP was a reselling CLEC the IXC cannot determine the identity of the new LSP to resend a BNA request.*

### Potential Customer Impacts:

- 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

# **Review of Appendices A and B to Joint Petitioners' Proposal**

- Minimum CARE Standards Document and Quick Reference Guide
- Minimum CARE End-to-End Process Flows
- Review Sample Paper Form of CARE
- Discuss NARUC Resolution

# QUICK REFERENCE TO MANDATORY MINIMUM CARE CODES AS PROPOSED BY JOINT PETITIONERS

## AC to LSP TCSI Codes:

Preferred Minimum TCSIs	Description
0101, 0104, 0105	<b>PIC Install.</b> Allows for an AC to submit a PIC Order on behalf of the end user customer requesting the specific AC service(s)
0501	<b>BNA Request.</b> Allows an AC to request a billing name/address to be able to bill usage for a WTN not in the Carrier's database.

## LSP to AC TCSIs:

Preferred Minimum TCSIs	Alternative TCSIs	Description
2008, 2009, 2010	2003	<b>PIC Install from LSP.</b> Allows for accurate establishment of end user account and billing of end user usage as PIC'd account
2004		<b>IXC PIC Confirmation.</b> Allows for accurate billing of end user usage as PIC'd account. Also confirms PIC change was done at request of AC. In event of PIC dispute this TCSI confirms AC submitted the change. [in response to 01XX]
2005		<b>Customer Move within LSP area.</b> Allows accurate billing of end user usage as PIC'd account. Also provides new telephone number and address of end user.
2007		<b>Change of Responsibility Billing Party.</b> Allows accurate billing of end user usage as PIC'd account, and also allows for accurate billing of previous usage to old responsible party.
2011		<b>PIC Dispute to Authorized Carrier from LEC.</b> Provides information to the AC for FCC Slamming requirements.
2020		<b>Toll Reseller PIC.</b> Accurately identifies the account as being PIC'd to a Toll Reseller.
21XX, 31XX, 41XX		<b>Rejects.</b> Rejects to an IXC order (01XX) telling the IXC that the PIC Order can be completed. In order to implement the customer's request, these reject codes are a valuable tool to assist in re-working an end user.
2215, 2216	2201	<b>Service Disconnect.</b> Cancels the end users service for the AC. AC will issue Final Bill to the end user.
2202		<b>Disconnect Notice when Customer Moves.</b> Allows for accurate billing of end user usage. Paired with the 2005 the end user's account will remain intact at the AC.
2203		<b>Customer OutPIC via LEC.</b> Allows the AC to accurately status the end user account as not PIC'd and, if appropriate, render a final bill.
2206		<b>Customer OutPIC via Another IXC.</b> Allows the AC to accurately status the end user account as Not PIC'd and, if appropriate, renders a final bill.
2212		<b>Change of Responsible Billing Party.</b> Allows for accurate final bill of end user usage on previous party account. Also allows for accurate billing of new usage to new responsible party if PIC remains with AC. [paired with 2007]
2219	2217, 2218	<b>PIC Dispute to Unauthorized Carrier from LEC.</b> Allows for the timely resolution of the end user's PIC Dispute per FCC/State PUC Slamming requirements.
2231		<b>Customer Changes LEC via Number Portability.</b> Allows for the timely billing of end user usage if the new local provider is identified to be able to request and receive the BNA information.
2233		<b>Customer Changes LEC via UNE-P and Resale.</b> Allows for the timely billing of end user's final bill or allows for uninterrupted billing to end user customer who only changed his local service provider.
2234		<b>Customer Changes (ported or migrated) to another LEC.</b> This notifies the IXC of termination of a local resale arrangement between the LSP and SWP.
2317, 2368, 2369		<b>Account Maintenance - Critical End User Information Changes.</b> Allows for the timely, accurate billing of the end user usage without disruption of end user service. Absent account changes the bills would be sent to the wrong end user.
2503		<b>BNA Response.</b> Allows for timely, accurate billing of usage on PIC'd customers.
2504		<b>BNA Response.</b> Allows for timely accurate billing of usage on Non-PIC'd customers.
26XX		<b>Rejects for BNA for ANI Requests (0501).</b> Informs the submitting AC this ANI is either not found in the Provider records or belongs to a different Local Service Provider.
2710		<b>Temporary Local Service Deny.</b> Advises the PIC'd AC the end user service is suspended. Allows the AC to take necessary steps on it's own network &/or calling card processes.
2711		<b>Temporary Local Service Restore.</b> Advises the PIC'd AC the end user service is restored from suspension. Allows the AC to reverse the steps taken in 2710 activity.
2716	2720, 2721	<b>Toll Only Network Block Installed.</b> Advises the PIC'd AC the end user 1+ service is blocked. Allows the AC to take necessary steps on it's own network &/or calling card processes.
2717		<b>Toll Only Network Block Removed.</b> Advises the PIC'd AC the end user service is restored from block. Allows the AC to reverse the steps taken in 2716 (2720/2721) activity.

## GLOSSARY OF TERMS

Acronym	Definition
AC	Access Customer [a.k.a. Interexchange Carrier]
ANI	Automatic Number Identification
BNA	Billing Name and Address
BTN	Billing Telephone Number
CARE	Customer Account Record Exchange
CLEC	Competitive Local Exchange Company [Local Service Provider]
FCC	Federal Communications Commission
ICO	Independent Telephone Company [Local Service Provider]
ILEC	Incumbent Local Exchange Company [Local Service Provider]
ISI	Industry Support Interface
IXC	Interexchange Carrier [a.k.a. Access Customer]
LEC	Local Exchange Company [a.k.a. Local Service Provider]
LNP	Local Number Portability
LSP	Local Service Provider [a.k.a. Local Exchange Company]
NPAC	Number Portability Administration Center
NSP	Network Service Provider [a.k.a. Switch Provider]
OBF	Ordering and Billing Forum
PIC	Primary Interexchange Carrier
SI	Status Indicator
SWP	Switch Provider [a.k.a. Network Service Provider]
TC	Transaction Code
TCSI	Transaction Code Status Indicator
WTN	Working Telephone Number

# Sample Paper Form of CARE

## EXECUTING CARRIER NOTIFICATION FORM (SAMPLE)

LEC Name: \_\_\_\_\_ LEC ID: \_\_\_\_\_ Carrier: \_\_\_\_\_ Carrier Code: \_\_\_\_\_ Carrier ACNA: \_\_\_\_\_  
 Address: \_\_\_\_\_ Address: \_\_\_\_\_ Date Submitted: \_\_\_\_\_  
 Date Received: \_\_\_\_\_

<u>TCSI</u>	<u>BTN</u> <u>Current/New</u>	<u>WTN</u> <u>Current/New</u>	<u>Non-</u> <u>Pub</u> <u>Non-</u> <u>List</u>	<u>J</u> <u>I</u>	<u>RP</u> <u>I</u>	<u>Transactio</u> <u>n</u> <u>Date</u>	<u>C</u> <u>TI</u>	<u>Bill Name/Address</u>	<u>AC Order #</u>	<u>Effecti</u> <u>ve</u> <u>Date</u>	<u>LSP</u> <u>ID</u>
XXXX <i>Sample</i>	815XXXXXXXX <i>Sample</i>	815XXXXXXXX <i>Sample</i>	2	B	Y	090903	R	John Q. Smith 1234 Anystreet St. Apt C Anytown, State 3425XXXXXX	RXXXXXXXXXX	090903	XXXX
	BTN - Old 815XXXXXXXX	WTN - Old 815XXXXXXXX						<u>PTN #</u> NPANXXXXXX	<u>PTN -AI</u>		

Total Number of Pages Sent: \_\_\_\_\_

Total Number of Notifications: \_\_\_\_\_

# Sample Paper Form of CARE

## SUBMITTING CARRIER REQUEST NOTIFICATION FORM (SAMPLE)

**LEC Name:** \_\_\_\_\_ **LEC ID:** \_\_\_\_\_ **Carrier:** \_\_\_\_\_ **Carrier Code:** \_\_\_\_\_ **Carrier ACNA:** \_\_\_\_\_  
**Address:** \_\_\_\_\_ **Address:** \_\_\_\_\_ **Date Submitted:** \_\_\_\_\_  
**Date Received:** \_\_\_\_\_

<u>TCSI</u>	<u>BTN</u> <u>Current/New</u>	<u>WTN</u> <u>Current/New</u>	<u>CIC</u>	<u>JI</u>	<u>Transaction</u> <u>Date or PIC</u> <u>Authorization</u> <u>Date</u>	<u>CTI</u>	<u>Bill Name/Address</u>	<u>AC Order #</u>
XXXX <i>Sample</i> 0105	815XXXXXXXX <i>Sample</i>	815XXXXXXXX <i>Sample</i>	0288	B	090903	R	John Q. Smith 1234 Anystreet St. Apt C Anytown, State 3425XXXXX	XXXXXXXXXXXXX

**Total Number of Pages Sent:** \_\_\_\_\_

**Total Number of Notifications:** \_\_\_\_\_

# Recommendation

- Issue an Order to Implement Mandatory Minimum CARE Standards and any FNPRM for issues beyond the scope of this proceeding.