

September 22, 2004

Mandatory Minimum Standards for
Exchange of Customer Account
Information >>
Docket No. CG 02-386



Part I: Exchange of Customer Account Information Between IXC and LEC

>> The Commission Should Require all Carriers to Participate in Minimum CARE Standards

- The Commission should require all IXC's, CLEC's, and ILEC's to participate in CARE standards developed by the industry.
 - Participation will provide consistency sought within the industry and reduce the number of customer complaints involving billing errors.
- Mandatory participation would require the exchange of information between providers of activities affecting the customer's PIC.
 - Changes
 - Additions
 - Disconnects
 - Customer account information

>> The Commission Should Require Providers to Follow the CARE Standards Developed by the Industry

- ATIS OBF has already established guidelines and standards in a document entitled Equal Access Subscription Customer Account Record Exchange Industry Support Interface (CARE/ISI).
- The Commission need not and should not mandate its own set of standards or require the use of specific CARE codes as proposed by the Joint Petitioners.
 - The joint proposal goes beyond “minimum” standards.
 - The Petitioners’ proposed codes far exceed the information necessary to accomplish PIC changes for billing.
 - Mandating particular codes would constitute unjustified micromanagement of the CARE process by the Commission.
- The Commission should not dictate methods by which CARE information is exchanged. Instead, the Commission should require participation in CARE, but 1) allow carriers to select from among existing codes, and 2) allow carriers to retain the flexibility to transmit codes in the manner that best suits their needs and is compatible with their systems and sizes.

>> The Commission Should Not Adopt Performance Measurements

- The Commission's enforcement authority is sufficient to protect carriers and consumers.
 - The Enforcement Bureau has the ability to investigate charges of noncompliance.
- Mandating performance measures for CARE would be premature. Requiring IXC, CLEC, and ILEC to participate in CARE in accordance with the OBF guidelines will improve the exchange of customer information and minimize any adverse effects on customers.
- If the Commission were to establish performance measures, such standards:
 - Should not be based on the thresholds proposed by the Joint Petitioners.
 - Should apply evenly to all carriers.
 - Should preempt any state-imposed performance measures for the exchange of customer information.

>> Recommendation

- Commission should require all providers to participate in minimum CARE standards developed by the industry for changes involving a customer's presubscribed interexchange carrier



Part II: Exchange of Customer Account Information Between Local Service Providers

>> Local to Local Changes Are Just As Important

- The sharing of necessary customer information is not limited to changes involving presubscribed IXCs.
- The exchange of end user account information between local service providers is equally critical when a customer is switching local service.
- The same problems experienced by IXCs are shared by local service providers in the local exchange market.
 - Many local service providers, that are not subject to regulatory requirements, do not exchange information in a uniform manner and/or provide incomplete and untimely information.
- The result is often delayed service for the customer and/or double billing.

>> Information is Critical to Timely Local-to-Local Carrier Changes

- ? Customers switching local service providers demand the service transition to be seamless and timely.
- ? The exchange of certain information between the “old” and “new” service providers is essential when a customer: (1) switches between facilities-based local service providers **and**, (2) requests to retain the same telephone number (LNP). This information includes:
 1. Customer Service Record (CSR) information
 2. Local Service Request (LSR) to change local service provider
 3. Rejects/Clarifications regarding the submitted LSR
 4. Firm Order Confirmation (FOC) accepting the LSR submission
 5. Due Date to complete the change of the end user’s local service
- ? Customers do not receive the service they expect when:
 1. An “old” local service provider does not respond to the CSR request and/or LSR submission in a timely and/or consistent manner.
 2. All local service providers do not provide business rules for the exchange of information and LSR submission or changes rules without notice.
- ? As a result, customers can experience extended delays in establishing new service and confusion over the source of delay.

>> Minimum Standards Necessary for Local-to-Local Carrier Changes

In order to provide end users with a seamless and timely carrier change in situations involving facility-based providers and local number portability, the new local service provider needs the following:

1. Near real-time access to the “old” local service provider’s customer service records.
 - ? On-line access to customer service records, or at a minimum, 24 hour interval for CSR retrieval by facsimile or e-mail when on-line access is not available.

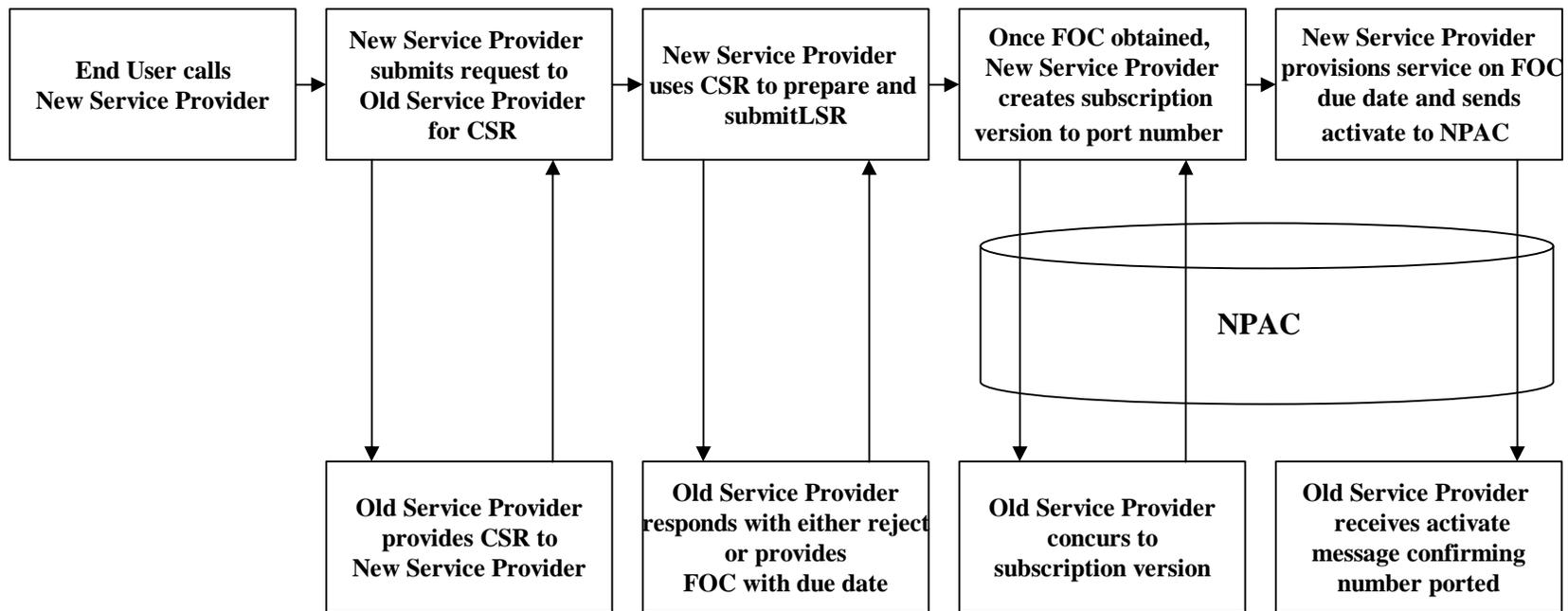
2. Minimum CSR information as described in the draft *Local Service Migration Guidelines, Issue 1*, which were developed by the Ordering and Billing Forum (OBF) of the Alliance For Telecommunications Industry Solutions (ATIS).
 - ? **Account level information**
 - ? Billing telephone number, Complete service name and address (including floor, suite, etc.)
 - ? Complete billing name and address (where required by State regulatory guidelines)
 - ? Directory listing information including address, listing type, etc. when requested
 - ? **Line level information**
 - ? Working telephone number(s)
 - ? Current preferred interexchange carrier for inter and intra LATA toll calls including freeze status
 - ? Local service freeze status, if applicable
 - ? All vertical features (e.g., custom calling, hunting, etc.) and options (e.g., Lifeline, 900 blocking, toll blocking, remote call forwarding, off-premises extensions, etc.)
 - ? Service configuration information (e.g., resale, UNE-P, unbundled loop)
 - ? Identification of any services on the end user’s line (e.g., line splitting, internet service, etc.)
 - ? Exchange Carrier Circuit ID (ECCKT) with associated telephone number when available and eligible for reuse



Minimum Standards Necessary for Local-to-Local Carrier Changes (continued)

3. Consistent and reasonable rejects/clarifications of Local Service Requests (LSRs) containing errors. Clarifications should be returned with all errors identified at once, rather than serially.
4. Timely return of rejects/clarifications and firm order confirmations (FOCs).
5. Reasonable due date intervals for the completion of the end user's change of local service. (i.e., 3 days for non-designed loops.)
6. Establishment and publication of consistent, complete, and reasonable business rules with a robust change management process and method to receive and respond to changes.
7. Adherence to industry standards, procedures, and rules for local number portability (LNP) and preferred provider freeze (or local service freeze), such as those that have been established by NANC, NPAC, the Commission, and the state regulatory commissions.

>> Summary of LNP Local-to-Local Carrier Change

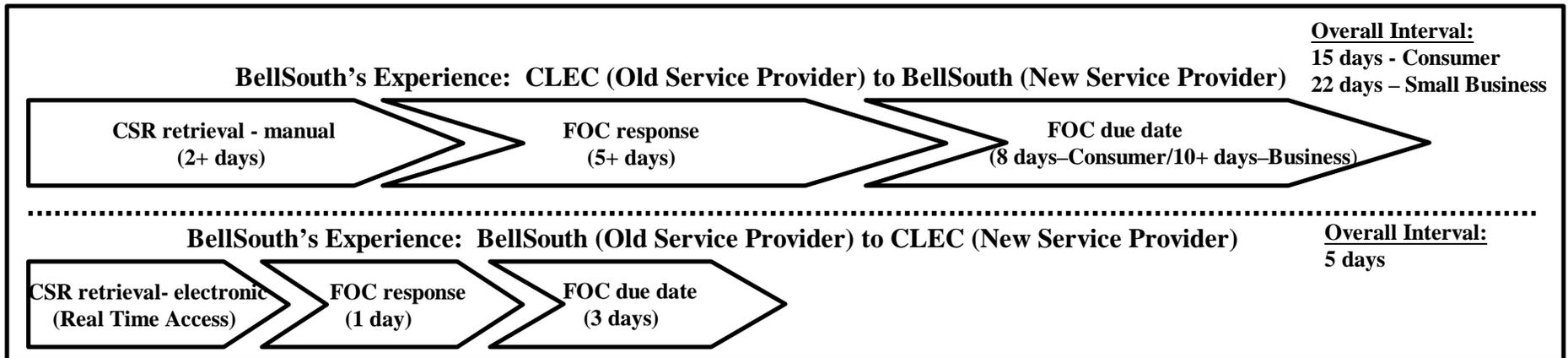
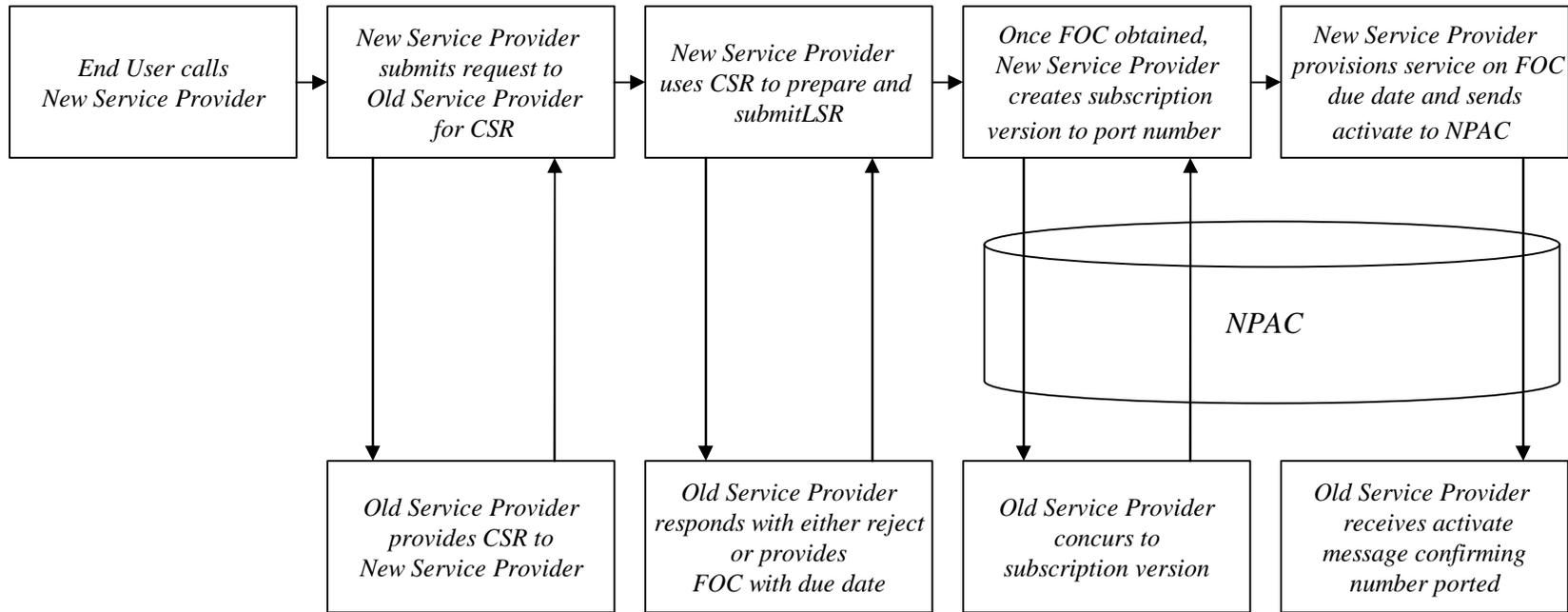


>> Timeliness is Important to Completing Local Service Change Requests

Example of current ILEC obligation (BellSouth-GA):

Reject Interval	Benchmark
Fully Mechanized	97% within 1 hour
Partially Mechanized	90% within 10 hours
Non-Mechanized (Manual)	95% within 24 hours
Firm Order Confirmation Timeliness	
Fully Mechanized	95% within 3 hours
Partially Mechanized	90% within 7 hours
Non-Mechanized (Manual)	95% within 24 hours
Average Response Time for Customer Service Record	
Fully Mechanized	Parity +2 seconds

>> Summary of LNP Local-to-Local Carrier Change - BellSouth's Experience



>> Recommendation

- Commission should implement mandatory minimum standards for the consistent and timely exchange of information between local service providers:
 - CSR retrieval (data, format, & timeliness)
 - LSR submission (establishment of and access to documented business rules)
 - LSR rejects/clarifications (consistency & timeliness)
 - FOC (data, format, & timeliness)
 - Reasonable due dates for migration
 - Change management process for business rules and change notifications
 - Adherence to industry standards