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October 15, 2004

Ex Parte

Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on All Local and Interexchange Carriers, CG Docket No. 02-386

Dear Ms. Dortch:

On September 15, 2004, the Joint Petitioners made an *ex parte* presentation in which they argue that the Commission should prescribe 35 specific CARE codes as the preferred minimum that all local exchange carriers and interexchange carriers must support. They argue that this is necessary because CARE standards have not been adopted and implemented uniformly in the industry. However, the examples they provide show that the billing problems faced by the interexchange carriers are due to the fact that some competitive local exchange carriers do not support CARE at all, rather than due to any inconsistency among carriers, like Verizon, that already support CARE. Therefore, the solution is to require carriers, both local and interexchange, that do not currently support CARE to begin exchanging information with other carriers using the CARE standard. The Commission should not require uniform codes or impose new requirements on carriers that already support CARE.

In addition, the CARE codes that the Joint Petitioners propose exceed the minimum necessary to share presubscription information with the interexchange carriers, and not all carriers that currently support CARE have the ability to support those specific codes. In their June 3 comments, many other carriers and carrier associations¹ urged the Commission not to adopt the Joint Petitioners' proposed detailed codes, raising the same issues as Verizon regarding the adequacy of current codes utilized and the cost of modifying those that are incompatible with those on the Joint Petitioners' list. As BellSouth demonstrated in its October 1, 2004 *ex parte* letter, it

¹ See, e.g., Cincinnati Bell at 5-11, Cox Communications at 7, Frontier and Citizens at 2-4, NCTA at 2-4, Oklahoma Rural Telcos at 6-7, Qwest at 5, Rural Incumbent Local Exchange Carriers at 7-11, SBC at 3-4, TDS Telecom at 8-10. Texas Statewide Telephone Coop at 3. USTA at 4-5 and 7.

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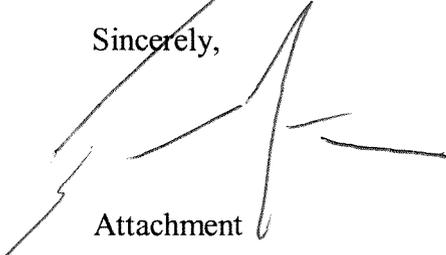
does not support all of the codes proposed by the Joint Petitioners, and only thirteen of the codes that it does support are necessary to address the billing problems raised by the Joint Petitioners. However, even BellSouth's list should not be adopted by the Commission as a mandatory minimum that all carriers must support. As is shown in the attached table, Verizon's systems do not support all of the codes that BellSouth proposes. However, the table shows that Verizon supports other codes that provide the same information. Verizon should not be required to incur the expense of modifying its systems to support additional codes when it is already providing the information that interexchange carriers need to bill their customers on Verizon's network.

For these reasons, the Commission should not require the entire industry to support the specific codes proposed by the Joint Petitioners or even the shorter lists of codes that BellSouth and others currently support. The CARE standards were developed on a consensus basis by a broad spectrum of the industry in the Ordering and Billing Forum ("OBF") to enable the local exchange carriers and the interexchange carriers to communicate presubscription information with each other. It was never intended that any of the CARE codes would be mandatory. Rather, CARE gives the carriers the flexibility to choose the codes that they can support for the information that they need to exchange. This process has worked successfully in the past and the OBF should continue to be the forum for addressing how carriers exchange information. Rather than freeze in place a set of specific codes that all carriers must support in place of their current practices, the Commission should prescribe the *types* of information that carriers must exchange with each other in the CARE format and leave it to the carriers to determine which codes they can support. The Commission should adopt a rule that requires carriers to exchange the following five types of information in the CARE format;

- Presubscription Order/Reject (01XX/21XX)
- Presubscription Order Install (20XX)
- Service Disconnect (22XX)
- End User Information Change (23XX)
- Response to Access Carrier Request for Information/Reject (25XX/26XX)

This would address the problem of carriers that do not support CARE by establishing a standard for the types of information that must be exchanged while leaving the carriers with the flexibility to determine which codes they can support.

Sincerely,



Attachment

cc: Lisa Boehley

Verizon Supports Alternative Transaction Codes To Those On BellSouth's List

MINIMUM CARE CODES PROPOSED BY BELLSOUTH

CARE CODES SUPPORTED BY VERIZON

| | VERIZON EAST | VERIZON WEST | Alternate Transaction Codes Supported |
|---|-----------------|-----------------|--|
| • 0101 Order Install - All Terminals associated with WTN, if any | Yes | No | 0105* |
| • 0104 Order Install - All WTN/Terminals associated with WTN, if any | Yes | Yes | |
| • 0105 Order Install - Working Telephone Number (WTN) only | Yes | Yes | |
| • 0501 Order BNA - Request for BNA Info for Submitted ANI/WTN | Yes | Yes | |
| • 2003 Order Installed - End User Selected AC through AP | No | Yes | 2008,* 2009,* 2010* |
| • 2004 Order Installed - Confirmation of an AC Initiated Order | Yes | Yes | |
| • 2203 Service Disconnected - Customer Canceled AC Svc Through AP | Yes | Yes | |
| • 2206 Service Disconnected - Customer Cancel AC Svc Through AC Order | Yes | Yes | |
| • 2219 End User Canceled AC Service, Disputed PIC Selection | No | Yes | 2217,** 2218** |
| • 2231 Service Disconnected - Number Portability | Yes | Yes | |
| • 2317 Combination of Customer Information Changes | Yes | No | 2369* |
| • 2501 BNA for ANI/WTN as Requested by AC | Yes | No | 2504* |
| • 21XX/31XX/41XX Rejects | Yes | Yes | |

* Supported in both Verizon East and Verizon West systems

** Supported only in Verizon East