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October 22, 2004

Via Electronic Submission

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

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

Dear Ms. Dortch:

SBC Communications, Inc. ("SBC") respectfully submits this *ex parte* in the above-referenced proceeding in response to the *ex parte* presentation of AT&T, Sprint and MCI ("Joint Petitioners") filed on September 15, 2004.

In their *ex parte*, the Joint Petitioners state that the primary cause of the billing problems referenced in this proceeding is the lack of mandatory, minimum CARE standards. According to the Joint Petitioners, imposition of mandatory, minimum CARE standards is the only solution to ensure that carriers receive timely, accurate and reliable data regarding a customer's billing information, and alleviate consumer confusion, service delays, billing problems and customer complaints.

SBC agrees with the Joint Petitioners that mandatory participation in the CARE process by all local exchange carriers and interexchange carriers is the best solution. SBC, however, does not agree that the Commission should require LECs and IXC's to use the 35 specific CARE codes proposed by the Joint Petitioners to exchange billing information.

Rather, the Commission should only mandate that all carriers communicate specific business events using OBF CARE standards. This solution would allow companies to utilize the specific CARE codes that meet their individual business needs and, at the same time, communicate essential business events with each other.

Specifically, SBC proposes that the Commission adopt a rule which would require carriers to exchange the following types of information in a CARE format:

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- Subscription Order - IXC notification to LEC when customer presubscribes to the IXC through contact with IXC (any 0101-0105 TCSI Code can provide this information)
- Subscription Order Rejected - LEC notification to IXC when PIC change order is rejected and reason for rejection (any 21XX/31XX/41XX TCSI Code can provide this information)
- Subscription Order Install - LEC notification to IXC when PIC change successfully completes, when LEC's customer presubscribes to IXC or when LEC becomes new local service provider (any 20XX TCSI Code can provide this information)
- Subscription Service Disconnected - LEC notification to IXC when customer is removed from IXC's network or customer disconnects dialtone with LEC (any 22XX TCSI Code can provide this information)
- End User Information Changes - LEC notification to IXC when billing information about customer has changed (2317 or 2369 TCSI Code can provide this information)
- Access Carrier Request for Information - IXC requests BNA from LEC (0501 TCSI Code)
- Response to Access Carrier Request for Information - LEC response to IXC request for BNA information (2501 TCSI Code)
- Access Carrier Request for Information Rejected - LEC notification to IXC that request for information is rejected and reason for rejection (any 26XX TCSI Code can provide this information)

Under this proposed solution, the OBF would remain the forum for addressing the manner in which the aforementioned information is shared between carriers, thereby alleviating any need for the FCC to oversee the approval, disapproval, addition or deletion of specific CARE codes from a mandated list.

The attached table illustrates that while a specific SBC company may not support one of the petitioner's specific minimum codes, SBC does support an alternate code which will communicate the aforementioned essential business events.

If you have any questions, please contact the undersigned.

Sincerely,

/s/ Toni R. Acton

Attachment

cc: Lisa Boehley

SBC Analysis of CARE Codes as Proposed by the Joint Petitioners

| TCSIs | Definition | SBC Scenario | SBC Comments |
|-------|--|--|--|
| 0101 | Subscription Order - All Terminals if any with submitted WTN | If an IXC is contacted by a customer to establish service, the contacted IXC must notify the LEC providing local service to the customer that the IXC has been chosen as the customer's PIC. | Supported by ALL SBC companies |
| 0102 | The specific TERMINAL number provided is to be subscribed to the requesting AC | If an IXC is contacted by a customer to establish service, the contacted IXC must notify the LEC providing local service to the customer that the IXC has been chosen as the customer's PIC. | Not on NPRM list. Supported by some SBC companies as part of PIC change requests |
| 0104 | Subscription Order - All WTNs and terminals if any with submitted BTN | If an IXC is contacted by a customer to establish service, the contacted IXC must notify the LEC providing local service to the customer that the IXC has been chosen as the customer's PIC. | Supported by ALL SBC companies |
| 0105 | Subscription Order - WTN only | If an IXC is contacted by a customer to establish service, the contacted IXC must notify the LEC providing local service to the customer that the IXC has been chosen as the customer's PIC. | Supported by ALL SBC companies |
| 2003 | Subscription Order Install - End User selected AC through Provider | A local service provider must notify the IXC selected as the presubscribed IXC when a customer establishes new local service or changes the PIC. | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2004 | Subscription Order Install - Confirmation of AC initiated order | This is a confirmation response to the IXC input: 0101/0102/0104/0105 | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2005 | Subscription Order Install - End User selected AC through Provider - Moving | | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2007 | Subscription Order Install - New responsible party - Outstanding charges not assumed | | NOT supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2008 | Subscription Order Install - End User selected AC through Provider - New Service | | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2009 | Subscription Order Install - End User Selected AC through Provider - Change of PIC | | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2010 | Subscription Order Install - End User selected AC through Provider - Additional line | | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2011 | Subscription Order Install - End user selected AC through Provider due to dispute over PIC selection | Advises the IXC that the end user has returned to the IXC due to a dispute. Provides Unauthorized IXC info. | Supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2020 | Subscription Order Install - Confirmation of AC initiated order with Reseller Indicator Only. | This is a confirmation response to the 0101/0102/0104/0105 and should be sent in response when the IXC submits a change with the Toll Reseller indicator populated. | NOT supported by ALL SBC companies. There are other TCSI 20XX that communicate the business event. |
| 2201 | Subscription Service Disconnect - Service disconnect - Unspecified reason | | NOT supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2202 | Subscription Service Disconnect - Service Disconnect Moving | | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2203 | Subscription Service Disconnect - End User canceled AC service through Provider | A local service provider must notify the presubscribed IXC when a customer removes that IXC as the presubscribed IXC. | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2206 | Subscription Service Disconnect - End User canceled AC service through another AC order | This is the disconnect sent to the previous IXC as a result of an 0101/0104/0105 being sent to the local service provider. | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2212 | Subscription Service Disconnect - Previous Responsible party - Final bill rendered | | NOT supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2215 | Subscription Service Disconnect - Service disconnect - Partial | | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2216 | Subscription Service Disconnect - Service disconnect - Final | | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2217 | Subscription Service Disconnect - End user canceled AC service - Disputed PIC Selection - 1 PIC change charge | This is an alternative to 2219 - which would be beneficial for IXC to receive since the end user has disconnected them over a PIC dispute. | NOT supported by SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2218 | Subscription Service Disconnect - End user canceled AC service - Disputed PIC Selection - 2 PIC change charges | This is an alternative to 2219 - which would be beneficial for IXC to receive since the end user has disconnected them over a PIC dispute. | NOT supported by SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2219 | Subscription Service Disconnect - End user canceled AC service - Disputed PIC | This is an alternative to 2217 and 2218 - which would be beneficial for IXC to receive since the end user has disconnected them over a PIC dispute. Provides Authorized IXC info. | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2231 | Subscription Service Disconnect - Service disconnected - Number Portability | A local service provider must notify an IXC when a customer is porting a TN to a new provider. | NOT supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2233 | Subscription Service Disconnect - End User transferred to new LSP in a Local Resale Environment | A local service provider must notify an IXC when a customer is transferring to a new provider. | Supported by ALL SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2234 | Subscription Service Disconnect - Local Reseller notification of termination of local resale arrangement | | NOT supported by SBC companies. There are other TCSI 22XX that communicate the business event. |
| 2317 | End User Information Change - One or more end user information changes | Only supported for specific changes that other 23xx codes may not cover. | Not supported by all SBC companies. There are numerous 23XX codes that communicate the business event of end user information changes. |

SBC Analysis of CARE Codes as Proposed by the Joint Petitioners

| TCSIs | Definition | SBC Scenario | SBC Comments |
|----------------|--|---|--|
| 2368 | End User Information Change - BTN/Account Level information change | | Not supported by SBC companies. There are numerous 23XX codes that communicate the business event of end user information changes. |
| 2369 | End User Information Change - WTN/Line Level Information Change | | Not supported by SBC companies. There are numerous 23XX codes that communicate the business event of end user information changes. |
| 2710 | Advisory Information - Temporary Suspension of Service - Non Payment | | Not supported by all SBC companies. |
| 2711 | Advisory Information - Service restored from temporary suspension - Non payment | | Not supported by all SBC companies. |
| 2716 | Advisory Information - Access to AC's network blocked - Non payment | | Not supported by all SBC companies. |
| 2717 | Advisory Information - Access to AC's network restored | | Not supported by all SBC companies. |
| 2720 | Advisory Information - End user service blocked - reasons other than non payment | | Not supported by all SBC companies. |
| 2721 | Advisory Information - End user service blocked - reason not specified | | Not supported by SBC companies. |
| 21XX/31XX/41XX | Rejects | If a PIC order is rejected by a local service provider (LSP), the LSP must notify the IXC and provide a reason for the rejection. | If a LSP receives a PIC change request from a IXC that is flawed in some way, it is the LSP's responsibility to notify the IXC of the problems with the order so that a corrected order can be submitted. |
| 0501 | Request for information for submitted ANI | A local service provider must supply the BN, BA upon request of an IXC. | Supported by ALL SBC companies |
| 2501 | Response to AC Request for Information (05XX) - BNA Provided | A local service provider must supply the BN, BA upon request of an IXC. | Supported by all SBC companies. This TCSI was not included in the original petition, but could be used in a "minimum" scenario instead of 2503/2504. |
| 2503 | Response to AC Request for Information (05XX) - BNA for ANI is assigned to requesting AC | | Not supported by SBC companies. |
| 2504 | Response to AC Request for Information (05XX) - BNA for ANI is not assigned to requesting AC | | Not supported by SBC companies. |
| 26XX | Rejects | If a request for information is rejected by a LSP, the LSP must notify the IXC and provide a reason for the rejection. | If a LSP receives a request for information from a IXC that is flawed in some way, it is the LSP's responsibility to notify the IXC of the problems with the request so that a corrected request can be submitted. |