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October 27, 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:

On October 26, 2004, the undersigned, Davida Grant, and Eileen Sherman of SBC met with Jay Keithley, Gene Fullano, Erica McMahon, Lisa Boehley, and Richard Smith of the Consumer and Governmental Affairs Bureau. Participating by telephone were Jim Di Leonardo and Dave Clippard of SBC.

The purpose of the meeting was to discuss SBC's comments and ex parte in the above-referenced proceeding. SBC emphasized that the majority of billing problems raised in this proceeding are due to the lack of mandatory, minimum CARE standards. SBC urged the Commission to require all LECs and IXCs to utilize the CARE process and exchange, as a minimum, the specific data detailed on page 2 of its ex parte. SBC also encouraged the Commission to explore the problems that local service providers have with obtaining access to customer account information when customers switch providers.

If you have any questions, please contact the undersigned.

Sincerely,

/s/ Toni R. Acton

Attachment

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