

Tyrone Keys, Jr.
Associate Director
Federal Regulatory Advocacy



1300 I Street, NW, Suite 400 West
Washington, DC 20005

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Phone 202 515-2545
Fax 202 336-7922
tyrone.e.keys@verizon.com

Ex Parte

Ms. Marlene H. Dortch
Secretary
445 12th Street, SW
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 October 27, 2004 Joseph Dibella, Nathan McCoy and the undersigned representing Verizon met with Lisa Boehley, Gene Fullano, Jay Keithley, Erica McMahon, Nathan Olson and Richard Smith of the Consumer and Governmental Affairs Bureau to discuss the attached materials.

The attached was distributed and discussed at the meeting.

Sincerely,

A handwritten signature in black ink, appearing to be "Tyrone Keys, Jr.", written over a horizontal line. The signature is stylized and somewhat cursive.

Attachment

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



Standards for Exchange of Customer Account Information – CG 02-386

Presentation to the FCC

October 27, 2004



History of Industry Cooperation within OBF

- The FCC has avoided getting into the details of record exchange between carriers for almost 20 years, leaving these issues to be worked out within the industry's Ordering and Billing Forum (OBF)
- Examples
 - 5/19/98 - FCC mandated that price cap LECs implement the PIC-NONE process, but allowed basic flexibility in how it was done, not even mandating that it be done via CARE. CARE-02 process was completed September 1998.
 - 6/3/98 - FCC mandated that price cap LECs provide a PICC "class of customer" indicator. OBF process completed November 1998.
 - 2/99 - As a result of the FCC's 12/23/98 2nd Report and Order on Slamming, Issue 1865 was introduced into OBF by Pacific Bell and AT&T regarding identification of the Authorized and Unauthorized carrier during a PIC dispute. To address it, Issue 1877 was brought by AT&T and SBC. Resolved through the creation of a new data element, "Disputed CIC." Completed August 1999.



CARE is Large and Continually Evolving

- The industry has shown the ability to work through general FCC directives cooperatively in the OBF process
- The imposition of standardized requirements on LECs, such as time frames and minimum customer data fields, would undermine LECs' ability to refine CARE standards through industry forums and carrier-to-carrier negotiations
- The FCC need not be in the business of managing hundreds of codes, nor interfere with an industry process that has been functioning effectively for almost 20 years



CLEC Customer Information Sharing Is The Issue Not CARE

- CLECs are not providing basic subscriber info to IXC's to enable proper billing
- This CLEC failure isn't a reason to substitute regulatory requirements for an industry negotiated CARE process
- Petitioners haven't demonstrated deficiencies in ILEC CARE information or a basis to take action with regard to ILECs
- All that's needed is a minimum customer information exchange requirement, not regulated CARE codes



Transaction Code/Status Indicators

- Transaction Code/Status Indicators (TCSIs) available for use are far too numerous for a carrier to support each one of them
 - Access Carrier-to-LEC request - approximately 144 TCSIs
 - LEC-to-Access Carrier response - approximately 549 TCSIs
- Verizon supports 30-40 of the 144 access carrier-to-LEC requests
 - Systems limitations
 - Systems differences as a result of companies merging
 - Older codes that can't or shouldn't be accepted



Six Basic Types of CARE Transactions

- There are only five basic types of information carriers need to exchange. Verizon supports the following five series of transaction codes
 - Presubscription Order Install (20XX)
 - Presubscription Order/Reject (01XX/21XX)
 - Service Disconnect (22XX)
 - End User Information Change (23XX)
 - Response to Access Carrier Request for Information/Reject (25XX/26XX)



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

MINIMUM CARE CODES PROPOSED BY BELL SOUTH

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



Other Companies Have the Same Issues Regarding Specific Codes

- Verizon is not the only company (as supported in 6/3/04 Comments) to raise issues regarding the adequacy of current codes and the cost of changing them
- Practices will vary from company to company for the same scenario/business transaction
- FCC should not indicate what codes should be supported by the industry - selection of specific codes should be left to individual companies



Take Action to Ensure that CLECs Participate

- FCC should not impose new burdens on, or otherwise penalize ILECs, for CLEC failures
- ILECs cannot provide up-to-date information about subscribers that switch their service to CLECs
- FCC should clarify that CLECs are required to exchange the same six basic categories of information as ILECs, but let carriers decide the specific medium for information exchange