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October 7, 2005

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-B204  
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:

The CARE Coalition (“Coalition”)<sup>1</sup> hereby urges the Commission to move expeditiously to adopt the modifications to the Commission’s *Report and Order*,<sup>2</sup> in the above referenced proceeding, as proposed by the Coalition in *Ex Parte Letters* submitted on April 15 and June 15, 2005<sup>3</sup> and presented for comment by the Commission in a FCC Public Notice dated August 9, 2005.<sup>4</sup>

On February 25, 2005, the Commission adopted mandatory minimum standards governing the exchange of customer account information between local exchange carriers (LECs) and interexchange carriers (IXCs). These rules became effective on September 21, 2005.<sup>5</sup> In the *Ex Parte Letters*, the Coalition identified certain aspects of section 64.4002 of the Commission rules, adopted in the *Report and Order*, which the Commission should clarify/modify “in the interest of clarity and completeness.” As noted above, the Commission subsequently presented these proposed changes for comment. The Coalition is not aware of any parties opposing the proposed

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<sup>1</sup> Coalition Members are: AT&T, BellSouth, MCI, Qwest, SBC, Sprint and Verizon.

<sup>2</sup> *Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on All Local and Interexchange Carriers*, CG Docket No. 02-386, Report and Order, released February 25, 2005; published in the Federal Register at 70 Fed Reg 32258 (June 2, 2005) (“*Report and Order*”).

<sup>3</sup> Ex Parte Letter from Michael F. Del Casino, AT&T, to Marlene Dortch, FCC (April 15, 2005) and Ex Parte Letter from Michael F. Del Casino, AT&T, to Marlene Dortch, FCC (June 15, 2005) (jointly “*Ex Parte Letters*”).

<sup>4</sup> FCC Public Notice, DA No. 05-2266, CG Docket No. 02-386 (Aug. 9, 2005). Comments were due on or before September 22, 2005. 70 Fed Reg 53137 (Sept. 7, 2005).

<sup>5</sup> 70 Fed Reg 55302 (Sept. 21, 2005).

modifications to the rules. Indeed, support for the proposed changes was expressed by the Texas Office of Public Utility Counsel in comments filed with the Commission on August 30, 2005.<sup>6</sup>

As the Commission concluded in the *Report and Order*, “minimum standards are needed to facilitate the exchange of customer account information between LECs and IXCs.”<sup>7</sup> Swift adoption of the Coalition’s non-controversial proposed modifications to clarify these standards will further the public interest.

Respectfully Submitted,

/s/ Karen Reidy

cc: Jay Keithley, CGB  
Erica McMahon, CGB  
Lisa Boehley, CGB  
David Marks, CGB  
Michael DelCasino, AT&T  
Jeanine Poltronieri, BellSouth  
Joan O’Donnell, Qwest  
Toni Acton, SBC  
Michael Fingerhut, Sprint  
Tyrone Keys, Verizon

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<sup>6</sup> Comments of the Texas Office of Public Utility Counsel, CG Docket No. 02-386, p. 1 (Aug. 30, 2005).

<sup>7</sup> *Report and Order*, ¶ 15.