



September 3, 2008

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

**RE: Ex Parte Notice. WC Docket No. 07-139. In the Matter of AT&T Inc. for Forbearance under 47 U.S.C. S 160(c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements**

On September 3, 2008, Kenneth Peres and Debbie Goldman, CWA research economists, met with Greg Orlando, Legal Advisor to Commissioner Deborah Taylor Tate, to discuss the above-captioned proceeding. No new arguments were raised during the meeting, and CWA's comments were consistent with its written comments and August 27, 2008 *ex parte* submission in this proceeding.

Specifically, CWA emphasized that the ARMIS service quality and customer satisfaction reports continue to be necessary so the Commission can monitor whether it is meeting its statutory obligation as enumerated in the Preamble to the Telecommunications Act of 1996 to secure "quality services for American telecommunications consumers" and in the universal service mandates of the Communications Act of 1934, as amended, to ensure that "quality services shall be available" to all consumers.<sup>1</sup>

ARMIS service quality and customer satisfaction reports continue to be necessary to protect consumers' interest in quality service, and therefore the ARMIS service quality and customer satisfaction reporting requirements continue to serve the public interest. Contrary to arguments made by the petitioners, competition is not sufficient to protect consumers as indicated by the deterioration of telephone service quality in recent years in many states; moreover, full disclosure enhances competition by facilitating informed consumer choice.

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<sup>1</sup> Preamble, Public Law 104-104, Feb. 8, 1996 and 47 U.S.C. Sec. 254(b)(1).

CWA as well as state commissions, utility consumer advocates, and other public interest groups have utilized the ARMIS data in various state and Commission proceedings. The ARMIS data is valuable because it is uniform, cost-efficient, publicly-available, user-friendly, and allows for comparisons over time, across companies, and across states. The service quality and customer satisfaction reports are not replicated elsewhere, and, unlike the Commission's ARMIS data, most states do not make the service quality data they collect available to the public.

CWA concurs with petitioners that the Commission should initiate a proceeding to ensure that all providers publicly measure and report ARMIS-like data that continues to be necessary to protect the public interest. In the meantime, AT&T and the other companies should continue to report their service quality and customer satisfaction data to the Commission which should continue to make this data available to the public in the current format, and should continue to maintain its infrastructure data which would be available upon request.

Sincerely,

A handwritten signature in black ink that reads "Kenneth R. Peres". The signature is written in a cursive, slightly slanted style.

Kenneth R. Peres, PhD.  
Research Economist  
Research and Development Department  
Communications Workers of America

cc: Greg Orlando