

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:

Empowering Consumers to Avoid Bill Shock: CG Docket No. 10-207  
Consumer Information and Disclosure: CG Docket No. 09-158

Reply Comments of:

Women Impacting Public Policy (WIPP)

**January 31, 2011**

## **Introduction**

WIPP appreciates the intent of the rulemaking, which is to provide customers with standard alerts before bill shock can occur. After all, WIPP members are not only small businesses but are significant consumers of wireless technology. Before the Federal Communications Commission (FCC) adopts regulations mandating how wireless companies compete with each other on customer service, it should consider the unintended consequences that can sometimes occur as a result of regulation. While a seemingly minor issue in the grand scheme of public policy, the subject of this proceeding has wide ranging implications for consumers and small businesses that rely on wireless broadband as their affordable on-ramp to the Internet. Small businesses are concerned that these regulations could create confusion just as wireless broadband services and devices are coming to the mass market.

WIPP believes that empowering consumers with informed choices is the best way to regulate carrier behavior because wireless consumers have demonstrated over and over again that they choose their carriers based on the quality of service and the price.

Given the frenetic pace at which wireless technologies, devices and service plans are evolving, the regulatory mandates the Commission is proposing could be codifying the lowest common denominator of consumer management usage tools when, in fact, carriers should be encouraged to develop better tools. The proposed regulations set forth by the Commission, could result in extra costs and de minimus benefits.

## **Education is Essential**

All of the above notwithstanding, WIPP believes education is the most powerful tool the Commission and the industry have to help consumers avoid unexpected charges on their monthly bills. While many wireless carriers are engaging in multi-faceted education campaigns – from providing educational material at the point of purchase, to including informative inserts with their monthly bills – this may not be enough. It may be time for the Commission and wireless carriers to join forces in educating and creating awareness of the many usage management tools that are available to small business customers of wireless carriers.

## **Regulation Should Be Reasonable**

Some of the proposed regulatory requirements with respect to notification may be impossible to implement and may result in more confusion among small business users than clarity. The U.S. wireless industry is driving tremendous innovation and investment across many sectors of our economy so we are concerned as businesses, that regulations by the FCC encourage innovation.

It is our understanding that technology such as “real-time” usage and overage alerts when roaming – has not yet been deployed that would allow all carriers to provide such alerts in real time. Further, we are concerned that the cost in developing and managing this system does not result in higher prices to consumers. We do not believe that requiring carriers to terminate a customer’s service if the consumer appears ready to go into overage is a good idea.

Any regulations should be narrowly tailored, easy to implement, applicable to all carriers, and avoid unintended consequences for small business consumers.

## **Conclusion**

WIPP believes that education is critical to the success of any campaign designed to empower small business consumers to avoid bill shock. If the Commission does decide that regulation is necessary the regulations should be precise, simple, universally applied and not require extreme measures.

WIPP is a national nonpartisan public policy organization, advocating on behalf of women in business in the legislative process of our nation, creating economic opportunities and building bridges and alliances to other small business organizations. WIPP's legislative strategy is to have the greatest possible impact for small business owners. We focus on our economic principles and craft a succinct small business message that we bring directly to members of Congress, the White House and Federal Agencies.