

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Rules and Regulations Implementing	)	
Minimum Customer Account Record	)	CG Docket No. 02-386
Exchange Obligations on All Local and	)	
Interexchange Carriers	)	
	)	
	)	
	)	

**Comments of the  
Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Ordering and Billing Forum (OBF) Subscription Committee, hereby files these comments in response to the Federal Communications Commission’s (Commission) *Notice of Proposed Rulemaking (NPRM)* in the above-referenced docket regarding the Customer Account Record Exchange (CARE) process.<sup>1</sup> In Section I of these comments, ATIS provides general background information regarding the industry’s development and maintenance of the CARE standard as documented in the ATIS OBF *Equal Access Subscription Customer Account Record Exchange Industry Support Interface (Care/ISI)* document. In Sections II and III, ATIS addresses several of the key issues framed by the Commission in the *NPRM*. Specifically, ATIS supports a mandatory obligation for all local service providers and interexchange carriers to participate in the exchange of CARE. Further, ATIS urges the Commission to recognize and endorse the continued development and maintenance of a single national CARE standard in the OBF, where the requisite industry expertise and experience resides.

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<sup>1</sup> *NPRM*, CG Docket No. 02-386, 69 Fed. Reg. 20845 (April 19, 2004).

**I. Background Information on ATIS, the OBF Subscription Committee and the CARE/ISI Document.**

**ATIS:** ATIS is a technical planning and standards development organization accredited by the American National Standards Institute (ANSI) and committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible and open approach. Over 1,100 industry professionals from more than 350 communications companies actively participate in ATIS' open industry committees, fora and "Incubators."<sup>2</sup> The ATIS membership spans all segments of the telecommunications industry, including local exchange carriers, interexchange carriers, manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, broadband providers, software developers and internet service providers.<sup>3</sup>

**OBF:** The Ordering and Billing Forum (OBF) is an ATIS-sponsored open industry forum for representatives of the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters. The OBF was originally established in 1985 in response to the *Lexitel Petition* and the Commission's resulting action endorsing the establishment of an industry forum to resolve, among other issues, problems encountered by interexchange carriers seeking to obtain equal access interconnection with local exchange carriers.<sup>4</sup> Today, the OBF has ten (10) Standing Committees that address and resolve issues through the development of national industry standards and guidelines ranging in subject matter from access and local service ordering and billing (including electronic data interchange) to toll

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<sup>2</sup> ATIS Incubators are industry-driven work groups that provide the industry with a "fast-track" process for resolving technical and operational issues. For more information, see the ATIS incubator web site at: <http://www.atis.org/incubator.shtml>.

<sup>3</sup> A current ATIS membership list may be obtained at <http://www.atis.org/atismembers.shtml>.

<sup>4</sup> *Memorandum Opinion and Order*, CC Docket No. 78-72, Rel. January 17, 1985.

free number administration and subscription issues.<sup>5</sup>

The OBF has eighty (80) member companies that represent a broad cross-section of the industry and include: interexchange carriers, local exchange carriers, competitive local exchange carriers, wireless providers, cable providers, OSS software developers and vendors. A list of the OBF Member Companies is provided in Appendix A to these comments.

The OBF operates according to the industry consensus process. This process is an effective vehicle for resolving complex technical, operational and business issues, and serves as an alternative or complement to government regulation. The consensus process is fair and open, thereby giving legitimacy and authority to the resulting work product. In terms of specific procedures, the OBF follows the ATIS Operating Procedures. The ATIS Operating Procedures provide a streamlined framework that affords due process while allowing for the timely resolution of technical and operational issues by the industry.<sup>6</sup> Pursuant to the ATIS Operating Procedures, Forum participants identify business problems facing the industry and introduce issues into the appropriate Standing Committees for resolution. The Standing Committees meet to discuss and resolve issues on a regular quarterly basis and schedule interim meetings and conference calls as-needed.

**OBF Subscription Committee:** The Subscription Committee provides a forum for telecommunications industry participants to develop common definitions and recommendations for the resolution of national subscription issues. The Subscription Committee has direct

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<sup>5</sup> The OBF Standing Committees are: Billing Committee, EDI Service Order Committee (ESOC), EDI Telecommunications Billing (ETB) Committee, Interconnection Service Ordering and Provisioning (ISOP) Committee, Local Service Ordering and Provisioning (LSOP) Committee, Message Processing Committee, Strategic Advisory Group (SAG), SMS/800 Number Administration Committee (SNAC), Subscription Committee and Wireless Committee. For further information regarding the OBF Standing Committees, please visit the ATIS web site at: <http://www.atis.org/obf/index.asp>.

<sup>6</sup> The ATIS Operating Procedures are posted on the ATIS web site at [www/atis.org](http://www/atis.org).

responsibility for the development and maintenance of the *Equal Access Subscription Customer Account Record Exchange Industry Support Interface (CARE/ISI)* document and addresses issues relative to the exchange of data in accordance with this document. The Subscription Committee participants include representatives from interexchange carriers, local exchange carriers, competitive local exchange carriers and vendors.<sup>7</sup>

**CARE ISI Document:** The ATIS OBF *Equal Access Subscription Customer Account Record Exchange Industry Support Interface (CARE/ISI)* document was developed to facilitate the exchange of end user account information. The *CARE/ISI* document describes industry recommendations for a standardized exchange of customer account information among telecommunications service providers, and provides information from the pre-conversion through the post-conversion environment. The document generically identifies data elements that might be shared between local service providers and interexchange carriers and supports a data format intended to facilitate the efficient exchange of that information.<sup>8</sup>

The process outlined in the *CARE/ISI* document allows for the transmission of multiple types of records on the same file, using special identifiers called Transaction Codes (TCs) and Status Indicators (SIs). The TC describes the nature or purpose of the data being exchanged. As an example, the TC can identify general lists of end users, orders processed or orders rejected. An SI is unique to each TC, and provides specific details associated with the TC. Each TC series is comprised of multiple SIs that identify, for example, the specific reason why an order is

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<sup>7</sup> Subscription Committee meetings from the period of August 2003 to May 2004 included representatives from the following companies: ALLTEL, Allstream, AMS, AT&T, Bell Canada, BellSouth, BellSouth Long Distance, CenturyTel, Cincinnati Bell, Cox Communications, Creative Support Solutions, Global Crossing, Hewlett Packard, Intrado, MCI, NeuStar, SBC, SBC Long Distance, Sprint, TDS Telecom, Telcordia, Valor Telecom, Verizon, Verizon Long Distance, WilTel and XO Communications.

<sup>8</sup> The available transmission options include: NDM/Connect:Direct, File Transfer Protocol (FTP), cartridge, e-mail, web-based and paper (fax or US mail).

rejected or the origin of an order that was processed. The *CARE/ISI* document designates the minimum data elements<sup>9</sup> that must be exchanged for each TCSI.

The *CARE/ISI* document is constantly maintained and updated by the industry as the regulatory arena changes and new players and scenarios impact subscription activity. For example, with the passage of the Telecommunications Act of 1996, the OBF Subscription Committee ensured that the *CARE/ISI* document included a wide range of TCs that may be used to process transactions related to the communication of end user information in a local service migration scenario.<sup>10</sup> With the release of the Commission's decision in CC Docket No. 94-129 regarding "slamming,"<sup>11</sup> the Committee developed a new TC series, additional SIs for existing transaction codes and new data elements. The Committee also developed process flows to provide a universal process for the local service provider to notify the authorized and alleged unauthorized carrier to comply with the Order. In addition, with the onset of wireless number portability, the Committee developed a new Number Portability Indicator (NPI) value of "W" that can be used on any applicable porting TCSI to indicate when a local line is ported to a wireless carrier.

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<sup>9</sup> The exchange of CARE is at the line level and includes customer specific details referred to as "data elements" (i.e., telephone number, customer billing name and address).

<sup>10</sup> In addition, Subscription Committee members are working with the members of OBF's Local Service Migration Task Force to develop Local Service Migration Guidelines. These Guidelines identify and isolate all local service migration information and processes within a single source document and explain the applicable OBF processes, forms and data elements to industry participants.

<sup>11</sup> See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Charges of Long Distance Carriers, CC Docket No. 94-129, *Second Report and Order and Further Notice of Proposed Rulemaking*, 64 Fed Reg 7745, 7763 (February 16, 1999), stayed in part, *MCI Worldcom, Inc. v. FCC*, No. 99-1125 (DC Cir. May 18, 1999). See also *First Order on Reconsideration*, CC Docket No. 94-129, 65 Fed Reg 47678 (August 3, 2000).

## **II. ATIS Supports a Mandatory Obligation for Local Service Providers and Interexchange Carriers to Participate in the Exchange of CARE.**

In the *NPRM*, the Commission seeks comment on whether mandatory minimum CARE obligations should be imposed on all local and interexchange carriers.<sup>12</sup> It is important to note that ATIS is only filing comments in support of a mandatory obligation for participation in the exchange of CARE. ATIS is not, at this time, taking a position on the specifics of the Joint Petitioners' recommended Minimum CARE standard.<sup>13</sup> While ATIS and the OBF member companies obviously support the use of the existing national industry standard as found in the *CARE/ISI* document, or any Transaction Code/Status Indicator (TCSI) subset thereof, the sufficiency of any given TCSI subset has not been thoroughly addressed in the industry forum process and therefore will be left for individual member company response.<sup>14</sup>

However, there is widespread industry support for mandatory participation from all local and interexchange carriers in the exchange of CARE, the guidelines for which are found in the *CARE/ISI* document. ATIS believes participation in the exchange of CARE by all industry players would go a long way towards resolving the consumer complaints and billing errors identified in the *NPRM*.<sup>15</sup> The companies that participate in the industry standards process (local service providers, interexchange carriers and vendors that develop and offer CARE solutions) go to great lengths to identify every potential scenario regarding subscription activity. Those same parties work together to identify resolutions and the necessary TCSI sets to allow for the flow of end user account information in each scenario.

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<sup>12</sup> *NPRM* at ¶10.

<sup>13</sup> AT&T, Sprint and WorldCom *Petition for Rulemaking* (filed Nov. 22, 2002) (*Joint Petition*) at Appendix A, p. 2.

<sup>14</sup> The OBF Subscription Committee has not addressed the subset of *CARE/ISI* TCSIs recommended as Minimum CARE Requirements by the Joint Petitioners nor has the OBF Subscription Committee addressed any other options for Minimum CARE Requirements at this point in time. However, it is worth emphasizing that the *CARE/ISI* document designates the minimum data elements required to be exchanged for each TCSI.

<sup>15</sup> *NPRM* at ¶10.

For example, when the wireless local number portability order<sup>16</sup> was released, industry participants assessed the impact in the context of subscription activity and brought an issue into the OBF to address the scenario where a local line is ported to a wireless carrier. At that time, there was no CARE notification process for the existing long distance carrier. The OBF resolved the issue by developing a new number portability indicator value of “W” that could be used on applicable porting TCSIs.<sup>17</sup>

The industry CARE standard, as provided for in the OBF *CARE/ISI* document, accounts for the possible and necessary scenarios regarding the exchange of end user account information. The consumer complaints and billing errors are not the result of a faulty CARE standard, but rather the result of companies not participating in the exchange of CARE. ATIS believes a significant portion of the consumer complaints and billing errors identified in the *NPRM* could be eliminated if all local service providers and interexchange carriers were required to participate in the exchange of CARE.

### **III. The ATIS OBF is the Appropriate Body for the Continued Development and Maintenance of a National CARE Standard.**

In the *NPRM*, the Commission notes the earlier filings of several carriers regarding the OBF as the appropriate venue for addressing the development and maintenance of the CARE process.<sup>18</sup> The ATIS OBF is a well-established and recognized industry body comprised of

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<sup>16</sup> Telephone Number Portability, *Memorandum Opinion and Order on Reconsideration and Order on Application For Review*, 67 Fed Reg. 40619 (June 13, 2002).

<sup>17</sup> The resolution of this matter is an example of how quickly the OBF can respond to emerging issues regarding the exchange of CARE. Issue 2407 relating to the development of the new indicator value was accepted by the OBF on May 6, 2002. On August 20, 2002, just over three months after it was accepted and long before the Commission adopted its final rules regarding wireless number portability, the matter was resolved and the issue closed.

<sup>18</sup> *NPRM* at ¶20. See also PUC Rulemaking Proceeding to Address Notification Issues Arising From Changes in Preferred Telecommunications Utilities, *Order Adopting an Amendment to §21.130 Relating to the Selection of Telecommunications Utilities, As Approved at the September 12, 2002 Open Meeting*, Texas Public Utility Commission Project No. 26131 (Sept 26, 2002) at p. 5, p. 20 (the Texas PUC agrees that all information necessary

subject matter experts that deal on a daily basis with the exchange of information among industry participants. The OBF Subscription Committee developed and has maintained ownership over the CARE process and the CARE/ISI document for almost 20 years. As has been pointed out in comments to the *Joint Petition*, technical and operational issues regarding the exchange of information are better addressed by the technical experts of the OBF than by a rulemaking proceeding.<sup>19</sup> The Commission acknowledged the OBF CARE process as an industry solution that has worked “reasonably well.”<sup>20</sup> Accordingly, ATIS submits that the OBF is the appropriate body for the continued development and maintenance of a single national CARE standard – the OBF CARE/ISI document.<sup>21</sup>

The Commission also seeks comment on whether a federally-mandated minimum CARE obligation would restrict the evolution of the industry CARE standard.<sup>22</sup> ATIS does not believe a federal mandate regarding participation in the exchange of CARE will restrict the evolution of the industry CARE standard provided, however, that the further development and maintenance of that standard is left to the industry. In fact, ATIS believes that a federal mandate regarding the participation in the exchange of CARE by all local service providers and interexchange carriers, along with an acknowledgement by the Commission of the OBF industry process and its

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to implement a change in carriers should be transmitted, but declines to specify additional detailed information because different companies’ transactions may necessitate different minimum information; while no specific notification method must be used, the PUC believes in using a standardized process and “strongly encourages” carriers in Texas to use a single standard).

<sup>19</sup> See e.g. BellSouth Comments at pp. 3-4, Allegiance Comments at pp. 4-5 and NECA Comments at p. 4.

<sup>20</sup> *NPRM* at ¶19.

<sup>21</sup> ATIS opposes a state-by-state approach to the development of CARE standards and urges the Commission to support the development of a single national standard. A single national standard will be easier for carriers, especially smaller carriers, to implement and would therefore be more likely to reduce the number of unbillable calls and customer complaints.

<sup>22</sup> *NPRM* at ¶21.

CARE/ISI document, would serve to foster the evolution and awareness of the industry CARE standard.<sup>23</sup> In turn, this would help the industry to resolve the issues cited in the *NPRM*.

#### **IV. Conclusion**

ATIS respectfully submits these comments in response to the Commission's *NPRM* in this matter supporting a mandatory obligation for all local service providers and interexchange carriers to participate in the exchange of CARE and urges the Commission to recognize and endorse the continued development and maintenance of one national CARE standard -- the OBF *CARE/ISI* document -- in the OBF industry forum process.

Respectfully submitted by:

**The Alliance for Telecommunications  
Industry Solutions** on behalf of its  
**Ordering and Billing Forum  
Subscription Committee**



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<sup>23</sup> A similar precedent exists where the Commission directed the industry and the national Pooling Administrator to follow the ATIS Industry Numbering Committee (INC) Pooling Guidelines. See *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, 65 Fed. Reg. 37703 (June 16, 2000) at ¶183 (“We note that the INC Pooling Guidelines complement our choice of implementing a nationwide thousands-block number pooling rollout. We therefore direct the industry and the national Pooling Administrator to follow the INC Pooling Guidelines relating to the functioning of the Pooling Administrator and entities requesting numbering resources from the Pooling Administrator.”)

APPENDIX A

**ATIS/OBF Member Company Listing**

**Dated: May 14, 2004**

1-800 American Free Trade Association	Martin Group, Inc.
Accenture LLP	MCI
ACM, Inc.	MetaSolv Software
ALLTEL Communications	Mid-America Computer Corp.
AT&T	National Information Solutions Cooperative
AT&T Wireless*	NECA Services
Bell Canada/Certen, Inc.	Neu Star, Inc.
BellSouth	Nextel
BellSouth Long Distance	Pae Tec Communications, Inc.
Billing Concepts	Pierce Neumeister Associates
Birch Telecom	Price Waterhouse Coopers
BroadMargin	Qwest
Canadian Clearinghouse	SBC, Inc.
Capgemini	SBC Long Distance
Century Telephone Enterprises	Sprint Corporation
Ceon Corporation	Supra Telecom
Charter FiberLink	Syniverse
Chillicothe Telephone Co.	Talk America
Choice One	TDS Telecom
Cincinnati Bell Telephone/Broadwing	Technology Staffing Resources, Inc.
Comcast	Telcordia Technologies
Commonwealth Long Distance	TEOCO Corporation
CommSoft	T-Mobile*
Communications Data Group	TXU Communications
Comporium Data Services	UDP, Inc.
Cooperative Communications Inc.	U.S. Cellular*
Cox Communications	Valor Telecommunications
Creative Support Solutions	Verisign
csf Corporation	Verizon
CTC Exchange Services	Verizon Long Distance
DSET Corporation	Vibrant Solutions
EUR Systems	Wiltel Communications
Global Crossing	Wisor
Horry Telephone Cooperative, Inc.	Worldwide Telegraph
Innovative Systems, LLC	XO Communications**
INTEC Telecom Systems	Z-Tel Communications
Intrado	
Long Distance Partnership	

\* Member of OBF Wireless Committee only. \*\* Auditing Member.