

**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	)	
	)	
	)	
	)	

**Reply 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 submits these reply 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 these reply comments, ATIS: (1) notes that there is strong support among commenters for the continued industry development of CARE standards through the ATIS OBF; and (2) clarifies the open nature of the OBF and its development of CARE to address the needs of all segments of the telecommunications industry.

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<sup>1</sup> *NPRM*, CG Docket No. 02-386, 69 Fed. Reg. 20845 (April 19, 2004). Reply comments are due June 18, 2004, forty-five (45) days after publication in the *Federal Register*.

## **I. There is Strong Support Among Commenters for the Continued Development of CARE by the OBF**

In its comments, ATIS supported a mandatory obligation for participation in the exchange of CARE, the guidelines for which are found in the ATIS OBF *Equal Access Subscription Customer Account Record Exchange Industry Support Interface (Care/ISI)* document.<sup>2</sup> ATIS did not address the subset of *CARE/ISI* Transaction Code Status Indicators (TCSIs) recommended as Minimum CARE Requirements by the Joint Petitioners or any other options for Minimum CARE Requirements. Instead, ATIS simply urged the Commission to recognize and endorse the continued development and maintenance of a single national CARE standard by the industry experts in the OBF. The importance of the industry's role, through the OBF, in the continued development and evolution of CARE is supported by numerous parties.

While commenters disagreed as to whether specific minimum CARE requirements should be established by the Commission, there was widespread support for the continuing role of the OBF in developing solutions for the exchange of customer account information. USTA notes "there is no reason for the FCC to act independently" of the OBF, which is "the proper forum for vetting issues concerning CARE."<sup>3</sup> Martin Group, Inc. asserts that "the current CARE standards, as developed and implemented by the various factions of the telecommunications industry, are already serving both customer and carrier interests in a sufficient manner."<sup>4</sup> TDS Telecommunications Group adds that the ATIS OBF provides an "effective forum" for the development of standards

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<sup>2</sup>Comments of the Alliance for Telecommunications Industry Solutions (ATIS Comments) at p. 6.

<sup>3</sup>Comments of the United States Telecom Association at pp. 1-2.

<sup>4</sup>Comments of Martin Group, Inc. at p. 1.

and procedures for exchanging necessary customer account information.<sup>5</sup> Cox Communications, Inc. acknowledges that the “best mechanism” for maintaining CARE standards “is the ongoing consultative process of the OBF rather than the comparatively cumbersome process of FCC notice and comment rulemaking.”<sup>6</sup>

Another common theme among many parties’ comments is that mandatory participation by local service providers and interexchange providers in the exchange of customer account information is the key to resolving billing problems. The New England Conference of Public Utilities Commissioners notes that the “CARE process as established by the Ordering and Billing Forum of ATIS has the advantage of providing a standard ‘language’ for how carriers communicate with one another” but the “system can only work if all carriers are required to use it...”<sup>7</sup> BellSouth observes that “mandatory participation in the CARE process by IXCs, CLECs and ILECs will provide the consistency sought within the industry and reduce the number of customer complaints involving billing errors.”<sup>8</sup> SBC Communications agrees and advocates that “mandatory participation in the CARE process is the best solution.”<sup>9</sup> Similarly, Verizon states that the problem stems from those carriers that do not support CARE and recommends that the “proper solution is to require new carriers to support CARE in the same way that incumbent local exchange carriers do.”<sup>10</sup>

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<sup>5</sup>Comments of TDS Telecommunications Corp. at p. 6.

<sup>6</sup>Comments of Cox Communications, Inc. at p. 4.

<sup>7</sup>New England Conference of Public Utilities Commissioners Comments to FCC NPRM at p.3.

<sup>8</sup>Comments of BellSouth Corporation at p. 3 (*footnote omitted*).

<sup>9</sup>Comments of SBC Communications at p. 8.

<sup>10</sup>Verizon Comments at p. 3.

ATIS reiterates its request that the Commission recognize and endorse the continued development and maintenance of a single national CARE standard by the industry experts in the OBF. A federal mandate regarding the participation in the exchange of CARE by all local service providers and interexchange carriers, along with an acknowledgment by the Commission of the OBF industry process and its *CARE/ISI* document, would help to resolve the billing problems noted by the Commission in the *NPRM*.

## **II. Participation in the ATIS OBF is Open to all Interested Parties**

Several commenters raised the issue of whether the ATIS OBF adequately represents all segments of the telecommunications industry.<sup>11</sup> ATIS strongly believes in the open and equitable nature of the OBF and its operating procedures.

As ATIS noted in its comments, the OBF operates according to the “industry consensus process.” This process is fair and open, and affords due process while allowing for the timely resolution of technical and operational issues by the industry.<sup>12</sup> The ATIS Operating Procedures further provide that consensus requires that “all views and objections be considered, and that a concerted effort be made toward their resolution.”<sup>13</sup> The wide variety of companies that participate in the industry standards process, including local service providers, interexchange carriers and vendors that

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<sup>11</sup>See Comments of Creative Support Solutions at p. 5; Comments of AT&T Corp., MCI and Sprint Corporation to Notice of Proposed Rulemaking at p. 8.

<sup>12</sup>ATIS Comments at p. 3.

<sup>13</sup>ATIS Operating Procedures at p. 6. The ATIS Operating Procedures are posted on the ATIS web site at [www.atis.org](http://www.atis.org).

develop and offer CARE solutions, make a concerted effort to ensure that the *CARE/ISI* document meets the evolving needs of all telecommunications carriers.

The open and representative nature of the OBF is acknowledged by commenters in this proceeding. TDS Telecommunications Corp., for instance, notes that the “voluntary process by which CARE standards are developed is sophisticated, efficient and credible. OBF has the institutional knowledge and history to impartially” evaluate necessary changes.<sup>14</sup> “The broad participation in the ATIS OBF process ensures that the concerns of all affected parties are fully taken into account in making any changes to the established process.”<sup>15</sup> SBC Communications remarks that “[p]ractically every segment in the telecommunications industry provides input into how this [CARE] process is used, including the type of customer data shared and the format used to communicate such data.”<sup>16</sup>

The open and equitable process used by the OBF to develop and maintain the *CARE/ISI* document and to address the evolving needs of the telecommunications industry can, and does, represent the needs of all segments of the telecommunications industry.<sup>17</sup> ATIS welcomes participation by any and all entities interested in this issue.

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<sup>14</sup>Comments of TDS Telecommunications Corp. at p. 7.

<sup>15</sup>*Id.*

<sup>16</sup>Comments of SBC Communications at p. 8.

<sup>17</sup>Some commenters have raised issues regarding the cost of the *CARE/ISI* document. *See* Comments of the Rural Incumbent Local Exchange Carriers on the Initial Regulatory Act Analysis at p. 14. ATIS does not believe that the cost of this document would preclude participation in CARE by even the smallest carriers. The purchase price (\$550) per issue covers the significant development and publication costs associated with this document. One issue is published per year, with quarterly updates included in the original purchase price. ATIS strongly objects to the suggestion that the document be made freely available on the internet. *Id.* Doing so would force members of the OBF that developed the document essentially to subsidize those carriers that have chosen not to participate.

### **III. Conclusion**

ATIS respectfully submits these reply comments and urges the Commission to consider the strong support among commenters for the continued industry development of CARE standards through the ATIS OBF and to endorse the continued development and maintenance of a single national CARE standard through the OBF's industry consensus process.

Respectfully submitted by:

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