

**ATTACHMENT I
VERIZON MA RESPONSES
TO DTE QUESTIONS ISSUED APRIL 7, 2006**

MA-DTE Investigation-Verizon MA's Comments

Guiding Principles

1. Customers must receive certain basic consumer protections from their telecommunications providers, even in a competitive market.
2. Customers must receive accurate information in order to make informed decisions on their own behalf.
3. Customers must have adequate notice of any changes to the terms and conditions of their service.
4. Customers must have adequate time to take action where action is required, and that some classes of customers may require additional time to act.
5. The Department's mission is not to absolve any party of the consequences of its actions.
6. Carriers and their customers are responsible for the consequences of their actions.
7. The Department will resolve disputes between carriers and their retail customers upon request.

| DTE Question | Verizon MA's Response | Relevant DTE Guiding Principles |
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| A. <u>General Questions</u> 1. What billing and termination or other consumer protection practices (e.g., service quality, privacy, marketing practices) are necessary for today's marketplace? | In today's increasingly competitive telecommunications environment the Department should defer to the marketplace as the primary regulator of the relationship between customers and their carrier. The Department should limit its regulations to the Guiding Principles stated above, with the exception of promulgating limited practices where specific time frames or a particular situation warrants such specificity. No practice should assume market failure, but rather should allow carriers to compete in an open and competitive market on the basis of price and service, recognizing that the Department retains its overall authority to investigate and address any areas of concern. | Customers must receive certain basic consumer protections from their telecommunications providers, even in a competitive market. |
| 2. Are there certain issues for which specific requirements are needed and other issues for which general guidelines or range of parameters would be appropriate? Please identify any such issues, and explain why a specific requirement or general policy is more appropriate. | Competition in the marketplace should be permitted to guide a provider's actions. If customers have issues with a provider, they will seek alternative providers and services. Therefore, for the most part the Department should rely on its Guiding Principles. Where specific requirements are necessary, Verizon MA has noted them in its response to specific questions. | Customers must receive accurate information in order to make informed decisions on their own behalf. |

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| <p>B. <u>Scope of Rules</u></p> <p>1. Should the new Practices apply only to certain types of carriers, (e.g., local exchange carriers ("LECs"), including incumbent as well as competitive facilities-based and resale LECs), or should the rules apply to other carriers regulated by the Department (e.g., cable)?</p> <p>2. Rather than applying to specific carriers, should the new Practices apply to specific services (e.g., local exchange service, interexchange service, etc.)? If the proposed Practices were to apply to other service offerings of a LEC or CLEC, please identify any conflicts that would exist between the proposed Practices and any other state or federal regulations including, but not limited to, 207 C.M.R. § 10.00 et seq.? Please also address how the Practices should address bundled services.</p> | <p>In an increasingly competitive marketplace, less regulation is appropriate and, therefore, any practices should limit the scope of regulation. The Guiding Principles should be equally applied only to the primary residence line offered to customers by all wireline carriers currently subject to Department regulation.</p> <p>The Guiding Principles should only apply to a wireline residential customer's primary line. Service-specific rules would be administratively unworkable as carriers are not required to offer specific services or mirror today's local exchange or toll areas of any carrier. Also, as the Department's question anticipates, service-specific rules could not be applied in any rational way to a bundled service plan that includes one price for local service, intrastate toll service, and optional features.</p> | |

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| <p>3. To what extent should the Department expand the updated Practices to apply to emerging/alternative technologies (e.g., Voice over Internet Protocol ("VoIP"), wireless)? Should the Department require minimum consumer protections for voice service in Massachusetts regardless of how that service is delivered?</p> | <p>The Department should not expand the scope of any practices to wireless or VoIP providers, which are not currently regulated by the Department. There is no market failure to be corrected for alternative technologies, which always have been subject to competitive markets. See also Verizon MA's Responses to B.1 and B.2., above.</p> | |
| <p><u>C. Customer Notice about Rates, Terms and Conditions</u></p> <p>1. Should carriers be required to provide written information about service offerings, rates, and terms and conditions to current and prospective customers, including but not limited to available alternative payment options and payment assistance programs (e.g., payment arrangements, disconnection moratoria for the ill or elderly, the right to be heard on billing matters in dispute), and of the eligibility requirements and application procedure for each?</p> | <p>Consistent with the Guiding Principles, carriers should be required to provide accurate information about services and products and customer practices (including customer assistance programs), but the Department should not dictate the form of that communication. Carriers should be free to decide if the information will be provided upon contact with their service representatives, on-line or in other printed forms, the company tariff, contract or any combination of the above.</p> <p>If the Department chooses to adopt more specific requirements, then with respect to issues of payment options and disconnection, carriers should provide one notice (either written or electronic) to a customer. A notice of service modification or discontinuance for nonpayment shall provide the date that the modification or discontinuance will occur and an adequate time for the customer to take action and advise the customer how to contact the carrier with regard to the notice.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> <p>Customers must have adequate notice of any changes to the terms and conditions of their service.</p> <p>Customers must have adequate time to take action where action is required, and that some classes of customers may require additional time to act.</p> |

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| <p>2. Should carriers be required to notify customers in advance of changes in their rates, terms and conditions of service, or changes in the ownership/control of the carrier, and, if so, what specific notice requirements should apply?</p> | <p>Carriers should provide advance notice of rate increases, and changes in terms and conditions, but the form, content, and timing of such notice should not be prescribed. In an increasingly competitive market, carriers must be able to respond quickly with new or modified services. Carriers and customers also should have flexibility to communicate with customers in any way they deem appropriate, such as through bill inserts, letters, e-mail, etc.</p> <p>Advance notice of changes in corporate ownership should not be required as such changes themselves do not affect customer rates, terms, conditions or billing.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> <p>Customers must have adequate notice of any changes to the terms and conditions of their service.</p> |
| <p>3. Should carriers be required to maintain their current DTE-approved tariff and pending tariff supplements on a publicly accessible website (e.g., on the carrier's website)?</p> | <p>The Department should not mandate that carriers maintain tariff information on their website. However, to the extent the Department adopts such a requirement it should apply to all wireline carriers that offer basic residential telephone service. One alternative would be for the Department to place all carrier tariffs on the Department's own website as is currently the practice in other states.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> <p>Customers must have adequate notice of any changes to the terms and conditions of their service.</p> |
| <p>D. <u>Billing</u></p> <p>1. Part 3 of the current Practices applies to residential customer bills. What requirements governing the billing process, including the format and frequency of customer bills should be included in the revised Practices?</p> | <p>Since the FCC's Truth-in-Billing Requirements (47 C.F.R. 64.2001) already set forth guidelines addressing these issues and are consistent with the DTE's Guiding Principles, the Department should defer to these FCC requirements and guidelines. Carriers should be permitted to determine the specifics of their bills and frequency so long as they are consistent with the Guiding Principles.</p> <p>Verizon MA would propose the following guidelines if some level of specificity is required:</p> <p>(Proposed Guideline) Charges and Billing for Installation, Connection and Restoration of Service. Whenever a customer requests that service be transferred from one location to another, the carrier may require as a condition of such transferred service payment of any undisputed regulated delinquent charges owed by the customer to the carrier or the carrier's affiliate in any state in which the carrier or the carrier's affiliate does business.</p> <p>(Proposed Guideline) All bills and notices of proposed discontinuance of service maybe sent by the carrier, either by U.S. mail or electronically to a customer.</p> | <p>Customers must have adequate notice of any changes to the terms and conditions of their service.</p> <p>Customers must have adequate time to take action where action is required, and that some classes of customers may require additional time to act.</p> |

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| <p>2. Should the updated Practices allow bills to include separately itemized surcharges and, if so, should the updated Practices have different rules for surcharges carriers are required to itemize (e.g., surcharges for E911 or disabilities access), and surcharges carriers choose to itemize (e.g., surcharges imposed to recover local property tax)? Should the updated Practices specify the format of all surcharges and the explanatory information to be included in customer bills (i.e., a simplified format)? See In the Matter of Truth-in-Billing and Billing Format; National Association of State Utility Consumer Advocates' Petition for Declaratory Ruling Regarding Truth-in-Billing, CC Docket No. 98-170, Second Report and Order, Declaratory Ruling, and Second Further Notice of Proposed Rulemaking, FCC 05-55 (rel. March 18, 2005).</p> | <p>The Department should follow the FCC's Truth-in-Billing Requirements on these issues.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |

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| <p>3. Should the updated Practices permit flexible billing frequency (e.g., establish a minimum billing period for all customers or establish different billing periods for different classes?) and, if so, should carriers and customers be allowed to agree to a different billing frequency?</p> | <p>Yes. The Department should permit carriers to adopt flexible billing frequency.</p> <p>If the Department chooses more specificity, a carrier should provide a customer with a timely and accurate bill in either a written or electronic format or in any other format agreed upon by the carrier and customer. In general, a bill shall be rendered on a monthly basis, except for administrative reasons, or where the carrier and the customer agree to a different frequency.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |
| <p>4. Should carriers be allowed to render bills by means other than mailing (e.g., electronically via the Internet)?</p> | <p>Yes, upon customer concurrence. In addition, if a customer has chosen to receive an electronic bill, then the carrier, absent a specific customer request to the contrary, should have the option to send the customer electronic notices as well.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |
| <p>5. Should the updated Practices address the situation where a carrier fails to bill a customer for service, or under-bills a customer for service and, if so, how far back in time should the carrier be allowed to back-bill (e.g., no more than six months from the date the initial error was discovered)? Should carriers offer customers a payment plan option for the same length of time as that of the under-billing?</p> | <p>No. The Department should rely on its Guiding Principles to resolve these disputes.</p> <p>If the Department requires more specificity, then it should adopt the following guideline:</p> <p>In the case of back-billing or under-billing of charges where there is no dispute, carriers should be required to provide customers with a reasonable time to pay based upon the amount and the time period of the back-billing or under-billing, as well as the customer's ability to pay. To the extent that a customer may need additional time to pay these back-billed or under-billed charges, the carrier should allow additional time not to exceed the period that covers the back-billing of under-billed period. The maximum time period for back-billing and under-billing should be governed by the applicable state statute of limitations to the extent documentation is available. (See Mass. General Laws c. 260, § 2, Statute of Limitations)</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> <p>Customers must have adequate notice of any changes to the terms and conditions of their service.</p> <p>Customers must have adequate time to take action where action is required, and that some classes of customers may require additional time to act.</p> |

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| <p>6. Should the updated Practices address the situation where a carrier over-bills a customer and, if so, how should over-billing adjustments be handled (e.g., should the refund be made for the entire period of the over-billing or some other period of time)? Should interest be paid on the amount of the overcharge and, if so, how should the rate of interest be calculated, and when and in what form should the amount of any overcharge be returned to the customer?</p> | <p>The Department should rely on its Guiding Principles to resolve these disputes.</p> <p>If the Department requires more specificity, then it should adopt the following: Carriers should be required to correct an over-billing situation to the extent records are available but no longer than 18 months (The FCC requires toll record be retained 18 months), unless the customer produces additional documentation that confirms a greater period. If the customer were assessed a late payment charge on such amount, such late payment charges should be refunded along with the over-billing amount. The form of the over-billing credit should depend on the amount, and whether or not the account in question is still active. If the account is a final account, the over-billing charge should be rendered in a check form. If the account is still active, the over-billing refund should be applied to payoff any outstanding debt owed to the provider. If after applying the over-billing to the outstanding debt, there still remains a credit, the customers may at their option, request a check refund. In the absence of any such request, such credit should remain on the customer's account and be applied to subsequent charges. Consistent with the time period for back-billing and under-billing, over-billing adjustments should also be governed by the applicable state statute of limitations to the extent documentation is available. (See Mass. General Laws c. 260, § 2, Statute of Limitations)</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |
| <p>7. Part 3.5 of the current Practices requires carriers to prorate charges for installation, restoration, or reconnection of service. Should the updated Practices continue to mandate that certain charges be prorated, or should carriers have the flexibility to offer, or not offer, payment arrangements and/or deferred payment plans?</p> | <p>The practice of prorating installation and restoration charges should only apply to residential customers that have a financial hardship (i.e., Lifeline customers). The term of any prorating should be negotiated on a case-by-case basis.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |

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| <p>8. Part 3.6 of the current Practices specifies the manner in which Customer Protection Notices must be rendered, including the size of the font; inclusion of a tagline in Spanish, Portuguese, or other languages required by the Department, which highlights the importance of the notice and the need to immediately translate the notice. What modifications, if any, should be made to the requirements contained in this rule?</p> | <p>Although Verizon MA believes that in an increasingly diverse marketplace in-language communications make good business sense, the Department should defer to the Guiding Principles instead of specific requirements.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |
| <p>9. Should the updated Practices limit the types of rates and charges that can be placed on a customer bill (e.g., rates and charges for telecommunications services only)? Should the updated Practices contain provisions addressing billing of third-party charges and, if so, what should those requirements be and why?</p> | <p>The Department should adopt the Guiding Principles and defer to the FCC's Truth-in-Billing Requirements on this issue for both the carrier's charges and where the carrier bills for a third-party. Many customers desire a "single bill" for all their telecommunications services (i.e., Wireless, landline, DSL, etc.) and as more new products and services are introduced (cable, VoIP, etc.), customers should still be able to request one bill for these services.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |

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| <p><u>E. Credit Requirements, Deposits, and Late Payments</u></p> <p>1. What specific requirements concerning credit, deposits and late or deferred payments should be included in the updated Practices, if any?</p> | <p>The Department should adopt the Guiding Principles and permit carriers to develop appropriate credit checking procedures and late payment mechanisms for their residential customers. Where a residential customer does not meet the carrier's credit checking criteria, carriers should be permitted to require a deposit, advance payment or offer a Direct Debit Payment Option (DDPO) as a condition of new service. In addition, a carrier should be entitled to deny service to a residential customer with an unpaid bill owed to the carrier or the carrier's affiliate in any state in which the carrier or the carrier's affiliate does business, or to require a deposit, advance payment or offer a DDPO, together with the payment of the unpaid bill, prior to providing new residential service.</p> | <p>Customers must receive certain basic consumer protections from their telecommunications providers, even in a competitive market.</p> <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |

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| 2. What information should be made available to carriers in order that applicants establish their identity (e.g., social security number)? | Customers should provide carriers with an acceptable measure of identity, including but not limited to Social Security number, acceptable picture ID or government ID, such as a Massachusetts drivers' license or military ID. | |
| 3. Under what circumstances should a carrier be able to refuse to provide service, including local service, to an applicant for residential service (e.g., indebtedness to another carrier, repeated delinquencies, or poor credit risk) and, if service is refused, what recourse should the prospective customer have? | See Verizon MA's Responses to A.1 and E.1 above. | Customers must receive certain basic consumer protections from their telecommunications providers, even in a competitive market. Customers must receive accurate information in order to make informed decisions on their own behalf. |

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| <p>4. Part 4.5 of the current Practices caps deposits for new residential service accounts at \$50, and deposits imposed as a condition of restoration of service or subsequent service at two times the average monthly bill. What deposit requirements should apply to new non-residential service accounts or to temporary or seasonal accounts as a condition of service and, are there any other circumstances under which a carrier should be allowed to require a deposit or advance payment?</p> | <p>Where a deposit is applicable for wireline residential service, a carrier should charge a reasonable deposit, such as two times the estimated monthly usage for the service being ordered or restored.</p> <p>No practice should apply for deposits for non-residential services as the scope of these rules should be limited only to primary residential service. For seasonal or temporary service, unless it is a primary residential line, then no deposit practice should apply. To the extent seasonal or temporary service is a primary residential service, then a reasonable deposit such as two times estimated monthly usage should apply.</p> | <p>Customers must receive certain basic consumer protections from their telecommunications providers, even in a competitive market.</p> <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> <p>The Department's mission is not to absolve any party of the consequences of its actions.</p> |
| <p>5. How long should carriers be allowed to hold deposits and should carriers be required to pay interest on deposits?</p> | <p>A carrier should be permitted to hold a customer deposit for a reasonable time (i.e., 12 months) in order to establish a payment and credit history. A carrier should pay interest on any deposit in accordance with the rate set by the Department. No deposit should be required for those customers that qualify for a customer assistance program.</p> | |
| <p>6. Should carriers be allowed to assess a fee and/or interest for delinquent payment of a bill and, if so, how should those charges be determined and should certain exemptions apply?</p> | <p>Carriers should be allowed to assess a late payment fee on delinquent accounts at a rate set by the marketplace. In addition, if an account is disconnected and the account is referred to an outside collection agency (OCA), the carrier should be permitted to recover additional expenses and costs associated with the collection activity. Carriers also should be allowed to collect a reconnection charge, unless the customer is under a customer assistance program.</p> | <p>The Department's mission is not to absolve any party of the consequences of its actions.</p> |

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| <p>7. Under existing Part 7, a deferred payment agreement may not include finance charges. Should the Department allow carriers to recover a reasonable finance charge on deferred payment agreements? Should the imposition of finance charges be limited to past due amounts relating to charges from long-distance service or enhanced services, such as call-waiting, caller ID or voice mail or, should finance charges apply to all services provided? How would finance charges apply to bundled packages that include long distance or enhanced services?</p> | <p>The Department should adopt the Guiding Principles and permit carriers the flexibility to include a finance charge in a deferred payment arrangement applicable to all regulated services.</p> | <p>The Department's mission is not to absolve any party of the consequences of its actions.</p> |

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| <p><u>F. Termination of Service</u></p> <p>1. Under the existing Practices, carriers are prohibited from disconnecting local service for non-payment of non-local charges, including third-party charges. In the revised Practices, should a similar provision apply when a customer receives a bundled package combining, for example, local, toll, video, and unregulated services, or when the carrier does not offer stand-alone local service?</p> | <p>When a customer purchases a bundled service offering and uses those services but fails to pay for them, a carrier should be permitted to disconnect for non-payment of all services included in the bundled package. Because customers purchase such bundled offerings as a package for a single price, carriers should be permitted to remove those services as a package for non-payment. Since not all providers are required to have a separate menu of services that would permit any "unbundling" of a package, no provider should be required to unbundled.</p> | <p>The Department's mission is not to absolve any party of the consequences of its actions.</p> |
| <p>2. Should written notice requirements apply to termination of service by carriers and, if so, what type of notice should be required? Should the Department permit carriers who provide electronic billing to their customers to provide notice of discontinuation through this same mode and, if so, how would such a process work?</p> | <p>Carriers should only have to send a single termination notice, as a past due bill also serves to notify a residence customer of any amounts owed. Unless a customer has agreed to receive electronic communications about service, the notice should be in writing.</p> | <p>Customers must receive certain basic consumer protections from their telecommunications providers, even in a competitive market.</p> <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> <p>Customers must have adequate notice of any changes to the terms and conditions of their service.</p> |

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| <p>3. Part 8 of the current Practices contains special provisions applicable to households in which all adult residents are 65 years of age or older ("elderly accounts"), which prevents carriers from disconnecting elderly accounts for non-payment without prior written approval from the Department. How should the updated Practices provide for disconnection protections for the elderly, if any?</p> | <p>The current practices applicable to elderly accounts should be eliminated. Financial hardship, not age, should be the determining requirement for added protection. The original elderly accounts practices are outdated and no longer necessary as they were adopted before the advent of current residential customer assistance programs, such as Lifeline.</p> | <p>Customers must have adequate time to take action where action is required, and that some classes of customers may require additional time to act.</p> <p>The Department's mission is not to absolve any party of the consequences of its actions.</p> |
| <p><u>G. Records Retention</u></p> <p>1. What records and other customer information should carriers be required to maintain (e.g., records of deposits), if any, and for what period of time?</p> | <p>The Department should adopt the Guiding Principles and permit carriers to determine reasonable records retention criteria and time frames for their customer records.</p> <p>To the extent guidelines are necessary, Verizon MA would recommend that carrier be required to retain customer records for no longer than 18 months, except for permanent customer records. See Verizon MA's Response to D.6 above.</p> | <p>Customers must receive accurate information in order to make informed decisions on their own behalf.</p> |
| <p><u>H. Billing and Service Disputes</u></p> <p>1. Should the updated Practices identify a specific process by which a customer disputes a bill to the carrier or seeks resolution of a service problem?</p> | <p>The Department should adopt the Guiding Principles but provide for a reasonable time frame (e.g., 90 days) for the resolution of a customer dispute of a bill or service issue brought to the attention of the carrier. If the carrier and the customer are unable to reach resolution, the Department should provide for a reasonable time frame (e.g., 90 days) for an informal dispute resolution by the Department.</p> | <p>The Department will resolve disputes between carriers and their retail customers upon request.</p> |

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| 2. Should small business customers (i.e., those with three lines or less) have the same rights to dispute a bill or seek resolution of a service problem as residential customers (e.g., recourse to the Department)? | Any proposed practices should be applied only to primary residential service and not to any business customers or services. See Verizon MA's Response to B.1 above. | The Department's mission is not to absolve any party of the consequences of its actions. |
| <u>I. Miscellaneous</u> 1. Are there other miscellaneous requirements not covered in the above questions that should be addressed in the updated Practices (e.g., directory assistance, low-income discounts, programs providing telecommunications access to disabled persons, E-911)? | Yes. A carrier should be permitted to discontinue a residential customer's service without notice where there is evidence of violation of the tariff, unlawful use of the service, evidence of fraud or where a network blockage or degradation occurs. The current practice requires a carrier to notify a customer and provide 15 days before termination, even in case of fraud. | |
| | | |