

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking on the
Commission's Own Motion to Establish
Consumer Rights and Consumer Protection
Rules Applicable to All
Telecommunications Utilities.

R. 00-02-004

**COMMENTS ON ASSIGNED COMMISSIONER'S RULING ON PROPOSED
CALIFORNIA TELEPHONE CORPORATION BILLING RULES
BY CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. D/B/A
FRONTIER COMMUNICATIONS OF CALIFORNIA**

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March 22, 2010

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Citizens Telecommunications Company of California Inc. d/b/a Frontier

Communications of California (U 1024 C) ("Frontier") provides these brief opening comments on Commissioner Bohn's February 12, 2010 Assigned Commissioner's Ruling (ACR) regarding proposed California telephone corporation billing rules.

Frontier and the Commission have a common desire to protect consumers from unauthorized charges from appearing on subscribers' bills. Frontier is committed to working with the Commission and other parties to arrive at rules that are fair and balanced for all concerned. Frontier believes that the proposed rules outlined in the ACR go well beyond the Commission's intent of adopting cramming reporting requirements. The proposed rules outlined in the ACR are designed to address three key objectives: 1) prevent unauthorized charges from being placed on the customer's bill; 2) identify promptly any unauthorized billings and 3) identify entities that present unauthorized charges and prevent them from presenting any future billings in California. In order to properly address these key objectives the Commission should conduct additional industry workshops to allow all industry participants to properly vet all of the

issues and develop a set of industry rules to address the Commission's key objectives. The ACR does not provide justification for some of the proposed rules. The ACR went beyond consolidating two previously adopted sets of rules into a comprehensive standard set of rules applicable to all California telephone corporations. In fact, the resulting ACR went beyond this premise without any justification. For instance, the ACR does not explain why the existing rules need to be expanded nor, does the ACR indicate if there is an increase in slamming complaints. The ACR fails to consider the costs each carrier will incur to implement proposed rules. Some of the requirements outlined in the ACR may require some carriers to significantly modify their existing billing system processes or create completely new system processes in order to capture data for reporting purposes when other steps could more effectively and efficiently protect consumers. The rules outlined in the ACR lack clarity and potentially expose billing corporations to a greater liability beyond their control. These rules do not apply to non-regulated providers of telecommunications services and put regulated entities at a competitive disadvantage while leaving a large segment of customers without protections.

Frontier recommends that the Commission hold a workshop to discuss in more detail the proposed rules and to dialogue with the industry alternatives in order to achieve the goals of the commission.

Dated March 22, 2010

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC.
D/B/A FRONTIER COMMUNICATIONS OF CALIFORNIA



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CERTIFICATE OF SERVICE

I, Pam Pittenger, hereby certify that on this day I served a copy of the COMMENTS of

CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC.,
D/B/A FRONTIER COMMUNICATIONS OF CALIFORNIA

to all parties on the CPUC's service list for R.00-02-004. One true and correct Adobe Acrobat PDF copy was E-mailed to those parties on the service list who provided an E-mail address. For those parties who have not provided the Commission an electronic address, paper copies were provided via U.S. Mail.

Dated at Elk Grove, California, this 22nd day of March 2010.



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