

**Before the
Federal Communications Commission
WASHINGTON, D.C.**

In the matter of)	
)	CC Docket No. 94-1
Coalition for Affordable Local and Long)	CC Docket No. 96-45
Distance Service (Calls))	CC Docket No. 99-249
)	CC Docket No. 96-262
<i>Modified Proposal</i>)	

**REPORT ON CONSUMER EDUCATION BY THE MEMBERS
OF THE COALITION FOR AFFORDABLE LOCAL AND
LONG DISTANCE SERVICE ("CALLS")**

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September 19, 2000

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OF THE COALITION FOR AFFORDABLE LOCAL AND
LONG DISTANCE SERVICE (“CALLS”)**

Executive Summary

Since the adoption of the *Sixth Report and Order* substantially adopting the CALLS universal service and access charge reform proposal, CALLS and its member companies have been developing and conducting a coordinated consumer education effort targeted to:

- Educate consumers on how to understand their phone bills.
- Inform consumers how they can best inventory their long-distance and local service needs, and choose the most appropriate calling plan.
- Promote available government programs that assist low income consumers in obtaining telephone service.

Key elements of the CALLS consumer education effort include:

- CALLS launched a general consumer education portal, www.phonebillcentral.org, to provide a convenient gateway to telephone consumer resources available on the web, including information provided by groups other than CALLS members. This website has received over 103,000 “hits” since July 2000.
- CALLS developed and printed a brochure “Smart Consumer’s Guide to Telephone Service,” which has been approved by the FCC Consumer Information Bureau for distribution through GSA’s Federal Consumer Information Center.
- The launch, under the sponsorship of the United States Telecom Association, later this month of the first-ever nationwide, comprehensive consumer education database for Lifeline and Link-up, the FCC’s two assistance programs for low income consumers.
- AT&T sent letters to each of its 26 million Basic Schedule customers describing changes in long distance rate plans and identifying a range of options for them to consider.
- Sprint mailed to all its customers notifying them of the availability of a Sprint “no-minimum” long distance calling plan.
- Under a grant from Verizon and SBC, the National Consumer League developed its website on “Understanding your Phone Bill,” which was update following the *Sixth Report and Order*. This site has received more than 232,000 hits since July 2000.

- CALLS members are working in partnership with numerous national public interest organizations to disseminate information on how to shop for phone service and on the FCC's Lifeline and Linkup programs.
- Continued work by each CALLS members' state and local community relations organizations to distribute CALLS materials and other consumer education materials at the local community level.

Working in cooperation with the FCC's Consumer Information Bureau, the CALLS companies were able to implement the changes resulting from the CALLS proposals as adopted in the Sixth Report and Order in a manner that minimized customer concern and confusion.

TABLE OF CONTENTS

	<u>Page</u>
I. BACKGROUND AND FCC’S SIXTH REPORT AND ORDER.....	2
A. Background	2
B. Sixth Report and Order’s Consumer Education Provisions	5
II. EDUCATING CONSUMERS TO INVENTORY THEIR TELECOMMUNICATIONS NEEDS, AND TO UNDERSTAND THEIR TELEPHONE BILLS.....	6
A. Local Phone Bill Messages and Related Customer Service Support	8
B. Long Distance Company-Specific Consumer Education to Low Volume Long Distance Users	13
C. National Level Direct Consumer Education	17
D. Regional, State and Local Level Direct Consumer Education.....	24
1. AT&T	24
2. BellSouth.....	25
3. SBC	27
4. Sprint.....	27
5. Verizon.....	29
E. Consumer Education Efforts with Independent Organizations.....	33
F. Consumer Education Through the General Media.....	35
G. Evaluation of Efforts	36
III. PROMOTING AVAILABLE GOVERNMENT PROGRAMS THAT ASSIST LOW-INCOME IN OBTAINING TELEPHONE SERVICE	37
IV. CONCLUSION	43

**REPORT ON CONSUMER EDUCATION BY
THE MEMBERS OF THE
COALITION FOR AFFORDABLE LOCAL AND
LONG DISTANCE SERVICE ("CALLS")**

The members of the Coalition for Affordable Local and Long Distance Service ("CALLS") hereby submit a report of the consumer education efforts they have already made, and are undertaking, since the Commission's adoption of the *Sixth Report and Order in CC Docket Nos. 96-262 and 94-1, Report and Order in CC Docket No. 99-249, and Eleventh Report and Order in CC Docket No. 96-45 ("Sixth Report and Order")* on May 31, 2000.

Since the adoption of the *Sixth Report and Order*, CALLS and its member companies have initiated and conducted a broad-ranging consumer education campaign. CALLS and its members have created a new general consumer education portal, www.phonebillcentral.org;¹ developed a new consumer education brochure that has been approved by the FCC Consumer Information Bureau for distribution through the Federal Consumer Information Center;² and will be launching a Lifeline/Link-up website that for the first time will create a one-stop database for Lifeline/Link-up benefits, and eligibility criteria.³ CALLS and its members are promoting these consumer resources both nationally and at the state and local community levels. CALLS and its members have conducted consumer education efforts both directly, and in partnership with public interest organizations, including consumer groups.

Because of the efforts of CALLS and its members, American consumers have received, and will be receiving, quality information through a variety of channels to

¹ See Appendix A.

² See Appendix B.

³ The website's URL will be: <http://www.lifelinesupport.org>.

better equip them to select telecommunications services in an increasingly competitive and complex telecommunications marketplace. With consumers receiving explanatory materials and with multiple channels available to answer consumers questions, the recent changes in telephone bills -- those resulting from companies' actions implementing the *Sixth Report and Order* and associated commitments -- were put in place with very few consumer complaints or inquiries.

While this report provides a comprehensive overview and substantial detail on the efforts taken by CALLS members to date to educate consumers, it can by no means capture the entirety of such efforts. Virtually every interaction a company has with its customers or potential customers, including its advertising, is meant to inform and educate consumers. Each CALLS member company has regional and local organizations that interact daily in their communities, providing information and materials to community groups and individual consumers. There is no possible way to capture fully all of these efforts, which occur daily and on an ongoing basis.

I. BACKGROUND AND FCC'S SIXTH REPORT AND ORDER

A. Background.

The *Sixth Report and Order* adopted a comprehensive, coherent and integrated approach to interstate access charge, price cap and universal service reform, based substantially, but not completely, on the modified proposal by CALLS. These long-delayed changes for the first time make meaningful progress in implementing the subsidy reforms required by the Telecommunications Act of 1996, ensuring and stabilizing universal service for millions of rural and low income Americans and promoting the

development of broad, facilities-based competition and choice for residential and small business consumers. By simultaneously promoting competition while ensuring and preserving universal service, the *Sixth Report and Order* will clearly be pro-consumer, leading to lower prices, better value and greater innovation over the medium to long term.

The *Sixth Report and Order* also resulted in many near term consumer benefits. As the Commission observed, the modified CALLS proposal, together with independent, unilateral commitments by AT&T and Sprint with respect to long distance services,⁴ "provide[s] significant consumer benefits that we would not otherwise be able to ensure on such a wide-scale basis and in such a timely manner."⁵ These near-term benefits include elimination of the residential and single line business presubscribed interexchange carrier charge ("PICC"), the elimination of the minimum usage charge on AT&T's basic schedule long distance service and the commitment by Sprint to maintain a no-minimum usage charge plan, and increases in the Lifeline support for low-income consumers irrespective of the long distance plan they select. The end result of these changes was that millions of consumers saved money on their combined local and long distance monthly telephone bills -- particularly low volume AT&T basic schedule consumers -- without doing anything at all. All consumers have greater choices and the opportunity to save money on their combined total telephone bill as a result of the *Sixth Report and Order*.

Some of the consumer benefits that result from the *Sixth Report and Order*, as well as in pre-existing FCC rules and universal service programs, are fully realized only if consumers are aware of these benefits and opt to take advantage of them. The *Sixth*

⁴ See discussion *infra* Part II.B.

⁵ *Sixth Report and Order* at ¶ 35.

Report and Order, for example, protects Lifeline consumers against any increases in subscriber line charges and also structures incumbent LEC recovery of universal service charges so that those charges are not assessed against Lifeline consumers.⁶ A qualified low-income consumer who is unaware of Lifeline and who has not signed up for Lifeline service, however, will pay both the subscriber line charge and the incumbent LEC universal service fee.

Similarly, consumers can save substantially by choosing the right local and long distance service plans. Long distance companies offer a variety of plans, each tailored to the needs of specific sets of customers. Particularly for consumers that actually use long distance service (as distinguished from "no volume" long distance consumers who presubscribe but rarely place a call), those consumers will enjoy the maximum benefits of the *Sixth Report and Order* if they shop wisely and exercise choice in the marketplace. Educating consumers empowers them to make choices in the marketplace that are tailored to their own assessment of their needs, rather than interposing regulatory judgments of consumer needs and desires.

When it advanced its integrated, comprehensive access reform and universal service proposals, the members of CALLS recognized that there were some consumer benefits of the CALLS access reform and universal service proposal that would be best achieved if consumers were made aware of their options. There were also fears that the adoption of its proposal would result in several simultaneous changes that, occurring together, could create substantial consumer confusion as to the nature of the changes, the reasons for the changes and why they were necessary and helpful to consumers. In their revised proposal, the member of the CALLS therefore committed to work with the FCC's

⁶ *Id.* at ¶ 30.

Consumer Information Bureau to develop and implement a consumer education program as part of any implementation of the CALLS proposal.⁷

B. *Sixth Report and Order's* Consumer Education Provisions.

In the *Sixth Report and Order*, the Commission noted that the members of CALLS had committed to work with the FCC's Consumer Information Bureau to develop a consumer education plan. The FCC set three general objectives for the plan:

- "[I]nforming consumers how they can best inventory their long-distance and local service needs, and choose the most appropriate calling plan."⁸
- "[P]romot[ing] available government programs that assist low-income consumers in obtaining telephone service."⁹
- "[C]reat[ing] programs and materials to educate consumers on how to understand their phone bills."¹⁰

The Commission further noted that "materials must be made available in alternative formats and languages, in order to reach the maximum number of consumers."¹¹

The Commission directed the members of CALLS to file a report within 90 days of the effective date of the *Sixth Report and Order* detailing the consumer education efforts that they were making to implement their commitment to work with the Consumer Information Bureau to develop a consumer education plan.¹² This report is submitted in fulfillment of that requirement.

⁷ *Id.* at ¶ 248.

⁸ *Id.* at ¶ 249.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.* at ¶ 250.

II. EDUCATING CONSUMERS TO INVENTORY THEIR TELECOMMUNICATIONS NEEDS, AND TO UNDERSTAND THEIR TELEPHONE BILLS.

As the Commission recognized, an important first step for consumers to take in “smart shopping” for telecommunications services is to assess their telecommunications needs and to be able to read and comprehend their telephone bills.¹³ Because efforts to educate consumers to inventory their telephone needs and to educate consumers as to how to understand their telephone bill address the same set of consumers -- that is mass-market residential consumers -- CALLS approached both of these issues together. In addition, these two consumer education issues are integrally related: if consumers cannot read or understand their telephone bills, it is much more difficult for them to inventory their telecommunications needs.

CALLS and its members adopted a multi-pronged, local and national approach to general consumer education with respect to telephone bills, assessing telephone needs and shopping for telephone services. The approaches were deliberately designed to be overlapping, and to reach individual consumers through multiple means. CALLS and its members therefore developed materials to educate consumers using each of the following outreach avenues:

- Subscriber bills, explanatory bill messages and responses to inquiries from consumers regarding the changes in subscriber bills that resulted from the *Sixth Report and Order*.¹⁴
- National level efforts to distribute information and materials through creation of a single general educational website that would be promoted by all CALLS

¹³ *Id.* at ¶ 249.

¹⁴ *See generally* Appendix E.

members, www.phonebillcentral.org,¹⁵ and design and printing of a CALLS general consumer education brochure entitled “Smart Consumer’s Guide to Telephone Service” that will be distributed through the Federal Consumer Information Center in Pueblo, Colorado (www.pueblo.gsa.gov or 1-800-688-9889; TTY 1-800-326-2996) or by writing to: S. James, Consumer Information Center, P.O. Box 100, Pueblo, CO 81002.¹⁶

www.phonebillcentral.org has received over 103,000 “hits” since July 2000.

- State and local outreach efforts by each of the companies to promote www.phonebillcentral.org, and to distribute the CALLS general consumer education brochure directly (in addition to the distribution that will occur through the Federal Consumer Information Center).¹⁷
- Direct mailings by AT&T and Sprint to their customers regarding long distance rates plans.¹⁸
- Work with independent third party organizations to help them develop materials to educate their members and the public generally. One of these efforts, the National Consumer League's website on "Understanding Your Phone Bill",¹⁹ which was supported by a grant from Bell Atlantic (now Verizon) and Ameritech (now SBC), has recorded more than 232,000 hits since July 2000.
- Consumer education through general media.²⁰

¹⁵ Appendix A.

¹⁶ Appendix B.

¹⁷ See generally Appendix E.

¹⁸ Appendices E.1.a and E.4.a.

¹⁹ Appendix D.3.

²⁰ See generally Appendices C, D, and E.

This multi-pronged approach recognized that no one approach would be sufficient for educating consumers. Moreover, it was designed deliberately to capitalize on the fact that CALLS members have customer and community relations personnel spread throughout the country.

A. Local Phone Bill Messages and Related Customer Service Support.

CALLS' member companies recognized that the first, critical opportunity to educate consumers about their telephone bills was on the bill messages that CALLS ILEC companies would be sending out with respect to changes that resulted from the *Sixth Report and Order*. CALLS sought to use the fact that these changes were occurring as an opportunity to answer consumers questions about the changes, to educate them about how to read their telephone bill, and to reduce consumer confusion to the maximum extent possible.

Each CALLS member company created telephone bill messages to explain the changes that were occurring on consumers' bills. Copies of those bill messages are attached at Appendix A and E, and are also available through the CALLS consumer education web portal, www.phonebillcentral.org. While each of these bill messages is the sole product of the issuing company, CALLS members attempted to provide a consistent set of information to consumers, subject to varying limitations of space, bill context, and state formal or informal regulation of billing practices. CALLS members also consulted with the FCC Consumer Information Bureau as these bill messages were developed.

CALLS members chose to focus on messages that actually appear on the customer bill because in their collective experience, members believed that bill messages

were more likely to be read, and therefore a more effective means of communication than bill inserts. Bill inserts, by contrast, are frequently overlooked by consumers who often discard them without reading them.

BellSouth included a detailed bill message in each bill cycle that contained a CALLS-related billing change. A message appeared in July to explain the increase in Subscriber Line Charges that was reflected in that month's bill.²¹ A message appeared again in September when the Universal Service Charge (retroactive to July 1, 2000) appeared on customer bills.²² BellSouth translated the same bill message into Spanish and included it in the July and September billing cycles for all Spanish language bills.²³ In addition, the message was translated into Braille and included in billing to customers who regularly receive Braille billing (5,398 customers region-wide).²⁴

SBC implemented a comprehensive bill messaging campaign to explain the changes that consumers may have noticed on their phone bills, as well as the impact the *Sixth Report and Order* had on telecommunications consumers.²⁵ Various bill messages were run during early-June to early-August, and are ongoing as the implementation of the universal service and access reform provisions of that order continues.²⁶ In California and Texas, these bill messages were also run in Spanish.²⁷ Whether printed in Spanish or English, all bill messages directed interested parties to call SBC Call Centers to obtain further information.

²¹ Appendix E.2.a.i.

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ See generally Appendix E.3.

²⁶ Appendix E.3.a.i.

²⁷ *Id.*

The Sprint local companies notified residential and business customers of the changes brought about by the FCC's adoption of CALLS in bill messages (in both English and Spanish) throughout July. The bill messages identified where the changes appeared on the bill and directed customers to call the Sprint Customer Service number should they have questions.²⁸ Additionally, a separate bill message (in both English and Spanish) was sent to Lifeline customers explaining their exemption from both the Subscriber Line Charge and the Universal Service Fee.²⁹

For Verizon, all customer bills in the July/August cycle (including Braille bills, large print bills and bills on the accessible on-line bill viewer for customers in the former Bell Atlantic states) included a detailed description of the CALLS-related changes.³⁰ The bills also included a dedicated 800-number for customers who wished to learn more about the new charges on their phone bill.³¹ In the former Bell Atlantic areas, over 200,000 Spanish language bills with Spanish bill messages were sent out. Spanish language bills and messages were also sent out to the former GTE service areas in California and Texas.³²

Each company also provided consumers with a toll-free number for further inquiries regarding the changes implemented on consumer bills beginning July 2000. Each CALLS member company ensured that its customer service representatives would be trained to answer inquiries related to the access reform and universal service-related billing changes. Some companies established specific call-in numbers with specific

²⁸ See Appendices E.4.a and E.4.e.

²⁹ Appendix E.4.i.

³⁰ See Appendix A (Bell Atlantic bill messages).

³¹ *Id.*

³² See *id.*

customer service personnel for this purpose. All companies prepared access reform and universal service Frequently Asked Questions for customer service representatives' use in answering customer inquiries.³³

Verizon established a dedicated call center to handle CALLS-related inquiries, and specially trained those personnel. Representatives at this call center have spoken with more than 13,500 customers about CALLS-related charges since the beginning of July 2000. Representatives in Verizon's residential customer service centers also responded to customer inquiries from telephone and TTY users. These centers include the Verizon Center for Customers with Disabilities (which currently serves the New York and New England area) as well as Verizon's multilingual call centers located in areas with high concentrations of non-English-speaking customers. These centers accept calls from customers speaking the Korean, Russian, Spanish, Italian, German, Polish, Vietnamese, and Chinese languages (languages vary according to local customer demographics).

The Sprint local companies equipped their call centers to receive and handle CALLS-related inquiries in both Spanish and English. Customer service representatives were provided comprehensive information and detailed "Q&A" materials to respond to customer's questions.³⁴

SBC has also been running call centers to receive CALLS-related inquiries. These SBC Call Centers have been given significant background information on the *Sixth*

³³ See Appendix A.

³⁴ See Appendix E.4.a.

Report and Order, as well as detailed Frequently Asked Questions lists to assist them in addressing consumer questions/concerns accurately.³⁵

In addition to its main customer service centers, BellSouth operates an extensive multilingual sales and service center. All 200 customer service representatives at its multilingual sales and service center received CALLS-related training, and CALLS customer service Frequently Asked Questions were translated into the languages supported in the center. Callers throughout the region can be transferred to this center without redialing, or they may call directly toll free. The following languages are supported: Spanish; French; Creole French; Portuguese; German; Italian; Russian; and Cantonese (Chinese). BellSouth also maintains a center to handle billing questions and explanations for hearing and vision-impaired customers. Personnel in the center for hearing and visually impaired customers were provided with all CALLS-related bill messages, training and Q&A materials to assist these customers.

To provide an additional means for consumers to get answers to their questions regarding bill changes and to disseminate the Frequently Asked Questions, CALLS also established a central consumer education website, www.phonebillcentral.org, which provided both information regarding the access reform and universal service-related bill changes, and more general consumer education information.³⁶ These efforts are discussed further, below.

³⁵ See Appendix E.3.a.ii.

³⁶ Appendix A.

B. Long Distance Company-Specific Consumer Education to Low Volume Long Distance Users.

At the same time that CALLS itself proposed revisions to its initial access reform and universal service proposal, AT&T individually and unilaterally made commitments to the FCC as to certain actions it would take with respect to specified long distance services in the event that the Commission adopted an access reform plan that, inter alia, provided at least \$2.1 billion in usage-sensitive interstate access charge reductions and eliminated the residential and single line business Presubscribed Interexchange Carrier Charge no later than July 1, 2000.³⁷ Sprint also individually and unilaterally made commitments to the Commission that it would take certain actions with respect to specified long distance services in the event the Commission adopted the modified CALLS access charge and universal service reform proposal.³⁸ Both the AT&T and Sprint commitments contained specific provisions on long distance consumer education.

AT&T and Sprint have fully implemented these company-specific consumer education commitments. After AT&T finalized its Basic schedule long distance rate plans -- which included eliminating the \$3 Minimum Usage Charge for all Basic Schedule customers, eliminating the Carrier Line Charge for all residential and single line business customers, introducing 10 cent Saturday and 10 cent Sunday options to its Basic Schedule and cutting the price on its One Rate Basic plan from 19 cents per minute to 16 cents per minute -- AT&T sent individual letters to over 26 million Basic Schedule customers describing the changes made in long distance plans and identifying a range of calling plan options for those customers to consider.³⁹ AT&T also provided those

³⁷ *Sixth Report and Order* at ¶ 246.

³⁸ *Id.*

³⁹ See Appendix E.1.a.

customers with a set of Frequently Asked Questions.⁴⁰ AT&T placed ads in over 100 newspapers nationwide informing consumers of the changes AT&T was making and the choices available.⁴¹ The ads were placed both in major daily newspapers and in papers with a significant demographic focus (e.g. serving particular ethnic groups). These ads ran in at least four different languages, depending on the language of the paper in which it was placed.

AT&T's letters and Frequently Asked Questions were provided in both English and Spanish, with approximately 480,000 customers receiving Spanish language materials. Customers that received their bill in Braille also received this correspondence in Braille.

In order to answer consumers' questions regarding AT&T's new rate plans and their available choices, AT&T established a special call-in number to provide both recorded information and the ability to reach an AT&T representative if the caller so desired. Through September 10, 2000, AT&T had received over 906,000 inquiries through that specialized call-in number. Information was also provided through AT&T's disabilities-related channels, such as through a TRS phone number.

AT&T also created a website that described the changes in its residential rate plans and provided customer options, www.att.com/news.⁴² Through September 10, 2000, this website had received over 75,000 inquiries.

In addition, in June 2000 before it had finalized its rate plans, AT&T launched a "Consumer Tips" section on its website.⁴³ The "Consumer Tips" section, which can be

⁴⁰ See Appendix E.1.b.

⁴¹ See Appendix E.1.c.

⁴² See Appendix E.1.e.

⁴³ *Id.*

accessed at www.att.com/consumertips, contains a pull down menu of smart-shopping suggestions for consumers considering long distance, wireless or Internet service provider (ISP) options.⁴⁴ The "Consumer Tips" section also contains suggestions on how to shop safely on-line and how to avoid telephone-based consumer frauds such as slamming and cramming.⁴⁵

AT&T has specifically included in its consumer tips section a simple page entitled "Choosing a Calling Plan."⁴⁶ This page encourages consumers to choose a provider based on all of their rates, to examine what they are paying for each call and on different days or at different times of the day, to ask carriers for all rates and not just the advertised rates, to be sure to check in state calling rates in addition to state-to-state rates, and for dial-up Internet users to be sure that their call to the dial-up access number is not incurring per minute or per call charges.⁴⁷

AT&T also participated with the American Association of Retired Persons ("AARP"), the nation's largest organization of midlife and older persons, in a campaign to educate AARP's over 30 million members. In addition to providing input to AARP on the campaign's content, AT&T provided an 800 number with a specific prompt for AARP members. This prompt directed the caller to a representative that would provide help to the AARP member in selecting a calling plan.

As it committed to do, Sprint mailed out over seven million notifications to its customers informing them of CALLS-related changes to their long distance bill, and that

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.*

Sprint offers a basic rate long distance plan with no monthly fee.⁴⁸ Sprint also added information to both its website (www.sprint.com) and its toll free customer service number (1-800-PIN-DROP) to inform consumers that Sprint has a basic rate long distance plan with no monthly fee.

In order to help consumers make sure they are on the best plan for them, Sprint provides two additional means for consumer assistance. On its website, Sprint provides consumers with an interactive product adviser that allows customers to see which Sprint calling plan best meets their calling pattern.⁴⁹ In addition, Sprint offers a toll free number, 1-800-877-4646, that automatically identifies whether the caller is on a Sprint long distance savings plan and, if they are not on a savings plan, the caller is then able to get information on Sprint's best savings plans, or to reach a live customer service representative.⁵⁰

Both Sprint and AT&T also cooperate with entities that develop comparison shopping tools. For example, Sprint and AT&T both supply information to TRAC, Abelltolls, and Consumer Action to help those consumer advocacy groups produce comparison shopping materials that are generally available to consumers.⁵¹ These types of shopping guides, examples of which are also referenced in CALLS consumer education materials, are important tools for consumers in comparing long distance rate plans that have many different variations.

⁴⁸ Appendix E.4.h.

⁴⁹ Appendix E.4.c.

⁵⁰ Appendix E.4.h.

⁵¹ See Appendix D.4.

C. National Level Direct Consumer Education.

CALLS members also recognized that many consumers might want to seek additional information about their telephone bills, both specifically to understand the changes that resulted from the *Sixth Report and Order*, and more generally. In order to provide easy access for consumers, as well as for third party organizations that might seek such information, CALLS established a general consumer education website, www.phonebillcentral.org.⁵² This website is the centerpiece of the initial CALLS national level consumer education efforts, with other efforts building on and tying into www.phonebillcentral.org.

www.phonebillcentral.org was designed to function as a telephone consumer education portal, with information on a variety of topics available for a consumer to access. www.phonebillcentral.org therefore contained or linked to materials addressing the following topics:

- A description of the *Sixth Report and Order* and the consumer benefits expected to flow from that order and associated commitments.⁵³
- Company-specific bill messages containing the same language as actually appeared on customer bills, but with hot links to a glossary of terms to help consumers better understand the bill messages. Bill messages by their nature

⁵² Appendix A.

⁵³ *Id.*

- cannot contain a lot of explanatory text, so the website back-up gave consumers an additional tool for understanding bill messages.⁵⁴
- Company-specific Frequently Asked Questions with information about the changes occurring on telephone bills, as well as other changes as a result of the *Sixth Report and Order*.⁵⁵ By providing company-specific, rather than generic national information, the information presented is more relevant and keyed to the individual customer's actual bill.
- The National Consumer League website entitled "Understanding Your Phone Bill."⁵⁶ This website was developed by NCL with a grant by Verizon (then Bell Atlantic) and SBC (then Ameritech). Following adoption of the *Sixth Report and Order*, the website was updated by NCL with the help of Verizon.
- The FCC/FTC brochure *Market Sense: Making Sense of Long Distance Advertising*, which was on the same page with links to long distance plan comparison shopping tools, webpricer at www.trac.org, www.myrateplan.com, www.decide.com, and www.getconnected.com.
- Links to company web pages for explanations of possible local service offerings, and local rate plan options for consumers.⁵⁷

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ Appendix D.3.

⁵⁷ Appendix A.

- A brief consumer tip sheet entitled "Staying Low Volume and Low Cost: A Consumer Education Guide for Long Distance Telephone Service," aimed at low volume consumers and suggesting ways to minimize telephone charges.⁵⁸
- Contact numbers for reaching each CALLS member company.⁵⁹
- A button entitled, "En Espanol" is being added to the website to take visitors directly to the site's Spanish language materials.

The CALLS consumer education website, www.phonebillcentral.org, was specifically designed to be used with various web-compatible disabilities access technologies. It is designed to be in compliance with the Worldwide Web Consortium's Web Accessibility Guidelines, does not rely upon graphics, and presents materials in text form. Key company-specific information, including bill messages and in the case of BellSouth and the former Bell Atlantic, Frequently Asked Questions, are provided in Spanish, as well as in English.⁶⁰

CALLS members recognized that a website by itself would be of little use unless consumers were made aware of the site. In order to inform consumers about the existence of the www.phonebillcentral.org consumer education portal, companies included the web portal as part of the scripts used by CALLS centers to handle CALLS-related billing inquiries.⁶¹ CALLS also placed www.phonebillcentral.org on the following portals by registering with those portals:

Self.Promotion.com
Excite
Yahoo

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *See* Appendix E.3.a.ii.

Lycos
Google
AltaVista
LookSmart
StartingPoint
HotBot
Inktomi Web page database (HotBot's search partner)
dmoz Open Directory Project
GoTo.com
Northern Light
Snap (NBC)
All the Web
InfoSeek
Jeeve's Sponsorship Network
WebCrawler

SBC's consumer bill messages in each of its 13 states included the URL for www.phonebillcentral.org. This included SBC's multilingual bill messages. SBC has run public notice ads in 34 newspapers in its 13-state region that included the URL.⁶² SBC also links to www.phonebillcentral.org from company websites. These links are from Frequently Asked Questions pages that answer the question "What are the latest changes to my phone bill."⁶³ Over 2600 visitors have reached www.phonebillcentral.org from SBC's websites.

BellSouth used its consumer bill messages to encourage consumers to visit www.phonebillcentral.org for more information.⁶⁴ Starting in July 2000, BellSouth also placed a banner ad on its main company websites to link interested consumers to www.phonebillcentral.org. These banner ads are prominently displayed and state,

⁶² See Appendices E.3.a.iii and E.3.a.v.

⁶³ See, e.g., http://www.swbell.com/Faqs/Faqs_detail/0,1049,5,00.html#407.

⁶⁴ Appendix E.2.a.i.

“Understand your phone bill. Click here for telephone consumer information.” The banner appears on the front page of the residential consumer section of BellSouth’s main commercial website, which is accessed by clicking on “At Your Home” from www.bellsouth.com home page.⁶⁵ The banner is also placed on the home page of the BellSouth Corporate Information website,⁶⁶ which receives over 100,000 visitors per month. As of September 8, 2000, over 7,500 visitors have reached the www.phonebillcentral.org website by clicking on the banners on BellSouth’s websites.

In addition, BellSouth printed the banner "Need help understanding your phone bill? Visit www.phonebillcentral.org for telephone consumer information" on the back of each of their billing envelopes for the months of September and October 2000.⁶⁷ This communications channel alone will reach over 16 million consumers in the BellSouth region.

Customers who contacted Verizon concerning CALLS related changes were informed about the www.phonebillcentral.org website, and all national consumer advocate contacts included coverage of this website as well. As the merged-company Verizon corporate website is redesigned and implemented, links to www.phonebillcentral.org will be prominently featured in appropriate locations.⁶⁸

Like other CALLS companies, Sprint also included the URL for www.phonebillcentral.org in the bill messages that were sent out.⁶⁹ Similarly, Sprint's call centers also refer consumers to www.phonebillcentral.org for additional information.

⁶⁵ http://www.bellsouth.com/bs_atyouhom.html.

⁶⁶ <http://www.bellsouthcorp.com>.

⁶⁷ Appendix E.2.a.i.

⁶⁸ The website is: <http://www.verizon.com>.

⁶⁹ See Appendix A (Sprint bill messages).

CALLS members' efforts to make consumers aware of www.phonebillcentral.org have been successful. Usage statistics show that between July 1, 2000 and September 19, 2000, www.phonebillcentral.org received over 103,000 "hits." These averaged over 8,000 "hits" per week, even with a lull during August that was exacerbated by the Verizon work stoppage. Visitors linked to the CALLS site from popular web portals such as Altavista, Yahoo, Google, Go.com, MSN, Netscape, and goto.com, among others, in addition to arriving from company sites or through direct contact.

CALLS members also recognized, however, that a solely web-based approach to consumer education would miss a significant number of consumers who do not have access to or use the web. To address this issue, CALLS adopted a two prong approach. As discussed further below, CALLS and its member companies engaged in substantial outreach to consumer organizations to encourage them to run telephone consumer education articles in their own organizational publications.⁷⁰

CALLS also has designed and printed a general consumer education brochure entitled "Smart Consumer's Guide to Telephone Service."⁷¹ CALLS will be printing 120,000 copies of this brochure, with companies locally printing and distributing additional copies from electronic (.pdf) versions. The brochure covers each of the four areas addressed by the www.phonebillcentral.org website, including:

- A brief summary of phone bill changes implemented beginning July 1, 2000, as a direct result of the *Sixth Report and Order*, noting in particular that certain charges are combined and that the National Access Fee (also known as the PICC) had disappeared from the long distance bill, and that many long

⁷⁰ See discussion *infra* Part II.E.

⁷¹ Appendix B.

distance telephone companies now offer long distance plans with no minimum usage fee.

- Tips for consumers on how to inventory their telecommunications needs, including reviewing the day of the week, time of day, duration and called party location for most calls. The brochure will refer consumers seeking further information to www.fcc.gov, www.nclnet.org (a site sponsored by the National Consumers League) and www.phonebillcentral.org, the CALLS consumer education website.
- Tips for low-income consumers related to Lifeline and Linkup programs, including the URL for www.lifelinesupport.com, the new CALLS/USTA comprehensive Lifeline education resource.

The FCC Consumer Information Bureau reviewed this brochure prior to printing and gave its approval for the brochures to be distributed through the General Services Administration's Federal Consumer Information Center in Pueblo, Colorado.

Distributing these consumer education brochures through the Federal Consumer Education Center means that consumers can request copies of the brochure either over the web (www.pueblo.gsa.gov), by calling 1-800-688-9889, TTY 1-800-326-2996, or by writing. The brochures will also be listed in the Federal Consumer Information Center's catalog of publications.

Electronic copies of the brochure will be available through the Federal Consumer Information Center in both English and Spanish. In addition, CALLS member companies also are distributing copies of these brochures directly to consumers through the companies' customer service and community relations personnel. CALLS member

companies will be printing and distributing the electronic Spanish-language version on a targeted basis. There will also be a large-type version of the brochure available in .pdf format to assist individuals with limited vision.

In addition, companies will be placing advertisements promoting the brochure and the Federal Consumer Information Center's 800 numbers. These ads will appear in a wide range of local and community newspapers.

D. Regional, State and Local Level Direct Consumer Education.

As part of their overall consumer education effort, CALLS member companies individually undertook numerous regional, state and local level consumer education efforts. These efforts are ongoing, and integrated into each company's community relations efforts and are only summarized here, with greater detail in Appendix E.

1. AT&T.

AT&T's initial consumer education resources and efforts have been concentrated at the national level and through consumer organizations. The initial focus was directed at assuring that long distance customers understood the CALLS related changes to their long distance service and the alternative options available to them. For example, as previously discussed, AT&T also participated in a consumer education campaign with the AARP.⁷² As part of that campaign, AT&T provided an 800 number with a prompt for AARP members, who could then reach a representative that would provide help to the AARP member in selecting a calling plan.⁷³

AT&T expects its local and regional outreach activities to accelerate in the coming months. AT&T participated with the New Jersey Citizens Action to produce

⁷² See *supra* p. 15.

⁷³ *Id.*

consumer information covering topics on understanding your phone bill, enrolling in calling plans and avoiding telephone fraud. This information will be made available in New Jersey to residents statewide.

AT&T will also provide CALLS education information through regular participation at events with, for example, the NAACP, Urban League, U.S. Hispanic Chamber of Commerce and the numerous day-to-day interactions AT&T has with community groups and at community events. AT&T has prepared a Consolidated Radio News Release that provides general phone service information as a consumer education service. That release is expected to be aired on many local stations nationwide. AT&T will also use the CALLS consumer education brochure to provide consumer education at local community events and disability group conferences that it attends. AT&T is also investigating the distribution of those brochures through its wireless stores.

2. BellSouth.

BellSouth has conducted an extensive grassroots consumer education campaign through its state and local community affairs organizations. Beginning in June and continuing through September, BellSouth has used a variety of communications channels to explain the consumer benefits of the CALLS reforms to a diverse cross-section of consumers. It is estimated that these efforts reached over four million consumers during the four month period. BellSouth will continue these types of activities on an ongoing basis. Examples of activities include:⁷⁴

- *Newspapers.* Op-eds, letters to the editor, articles, and advertisements in major urban, local, community and rural newspapers.

⁷⁴ See Appendix E.2.a.ii (containing sample news media clips).

- *Radio and TV.* Interviews, talk-show appearances, news segments, informational “ticker” on local weather channel, call-in shows, public service announcements.
- *Events/Meetings.* Speeches, presentations, and discussions at meetings of local and community organizations such as civic & neighborhood associations, local United Way chapters, Chambers of Commerce, Rotary & Kiwanis Clubs, Telephone Pioneers and employee gatherings, Senior Centers, high school associations, etc. In addition, BellSouth conducted numerous one-on-one or small group meetings/discussion with community & business leaders and state & local government officials such as city managers, state legislators, mayors, minority business leaders, economic development, consumer, and business organizations.
- *Distribution of Material.* Distribution of explanatory material (See attached “flyer”) either in connection with events/meetings (above) or directly to group members or for inclusion in group newsletters or bulletin boards. For example, information was distributed via church groups, public housing authorities, business and community extension programs, at community festivals, and at payment agencies.

In August 2000, BellSouth began trial deployment of its new phone bill format.⁷⁵ Developed using extensive consumer research, including a series of focus groups, this redesign of the phone bill responds to what consumers said they wanted – or didn’t want – in their phone bill. Among other things, consumers wanted less detail and to feature only critical information such as the amount due and detailed call information. They also wanted a larger size, using a summary page. BellSouth anticipates deployment to its

⁷⁵ The new consumer bill format is attached at Appendix E.2.a.iii.

entire customer base in 2001, following research to see if the redesigned bill gains customer acceptance.

3. SBC.

SBC will also distribute the CALLS brochure that was recently approved by the FCC for distribution from the CIC in Pueblo, Colorado. SBC anticipates that the activity level on this front will increase in the coming months as the CALLS implementation efforts continue and consumers become more aware of the new line items on their phone bills. Aside from the brochure, SBC has already engaged in this grass roots information campaign through:⁷⁶

- Contacts with Several State Commissions.
- Contacts with State Legislators in multiple states.
- Contacts with Numerous local Chambers of Commerce.
- Contacts with consumer welfare, civil rights, and community organizations (Rainbow-PUSH, Salvation Army, the United Way, and Rotary Clubs).
- Radio public service announcements and Newspaper Ads.
- Regularly scheduled Lifeline consumer contact events, PSAs, Radio and Newspaper ads.

4. Sprint.

In order to help customers understand their phone bills, Sprint's local companies launched a redesigned, reader friendly customer bill format – the “Millennium Bill” - in all 18 of the states in which the companies operate.⁷⁷ To get the word out, nearly 1000

⁷⁶ See Appendices E.3.a.iii-v and E.3.g.

⁷⁷ See Appendix E.4.g.

press kits were distributed throughout the local service territories containing a news release, a sample bill, and Fact Sheets.⁷⁸ A national news release included distribution of 100 videos and numerous media interviews.⁷⁹ Additionally, 200 copies of “Meeting in a Box” (power point presentation, video, and talking points) were distributed to regional Public Affairs Managers for presentations on the new bill to community groups.⁸⁰ Materials encouraged customers to visit the “How to Read Your New Bill” section of the Sprint.com/local internet website, which features “pop-up” information boxes highlighting new features of the bill. All customers received a bill insert prior to the month they received the new bill and one accompanying the new bill.⁸¹ The Fall 2000 issue of Sprint’s quarterly newsletter, SprintLink, which is sent to local leaders including mayors and other officeholders, school board presidents, and Chamber of Commerce officers, featured an article entitled: “Fitting the Bill: What Your Charges Actually Mean.” This same consumer-oriented message was conveyed in “advertorials” that Public Affairs Managers placed in local newspapers. Media analysis performed by CARMA International, Inc. found coverage of Sprint’s bill favorable, driven by the message, “Sprint’s bill is simple and easy to understand.”⁸²

⁷⁸ See Appendix E.4.f.

⁷⁹ *Id.*

⁸⁰ *Id.*

⁸¹ See Appendix E.4.e.

⁸² Appendix E.4.b.

Like other CALLS members, Sprint will be distributing the CALLS consumer education brochure, and Lifeline/Link-up materials through its local public affairs personnel.

5. Verizon.

In part in response to its August work stoppage and issues related to the integration of GTE and Bell Atlantic, Verizon's consumer education program has emphasized national-level and third-party endeavors in the first stage of the campaign, with localized efforts to follow in the coming months.⁸³

Verizon is working with its contacts in local and national non-profit organizations to spread the CALLS-related consumer education information and materials about understanding phone bills, saving money on phone expenses, and participating in Lifeline/Link-Up. Verizon believes that working with consumer organizations allows them to more efficiently reach consumers, and offers the additional benefit of heightened credibility, based on the involvement of a neutral party. In addition to the third party briefings mentioned elsewhere in this report, the following efforts have been and are taking place by Verizon:

Verizon has worked closely with the National Consumers League to create and update consumer web pages explaining common telecommunications charges. The telecom pages on the NCL website have had more than 232,000 "hits" since July 1, 2000 and are the most visited feature on the NCL website.⁸⁴

This past summer, Verizon sponsored "Internet Cafes" at the Biennial conference of the National Association of the Deaf and the Alexander Graham Bell Association for

⁸³ See Appendix E.5.a.

⁸⁴ See Appendix D.3.

the Deaf and Hard of Hearing. The Internet Cafes were among the most popular destinations at the conferences, with both sites averaging more than 1,000 visits per day; at both events the www.phonebillcentral.org website was the first stop on every internet surfing expedition. The website was also mentioned in the “Drivers Education for the Information Superhighway” presentations at the NAD conference. Attendees from across the country used these opportunities to raise questions about phone bill changes and strategies for saving money.

A Verizon presenter at the National Association of Consumer Agency Administrators also discussed the CALLS-related bill changes and the need for consumers to read and understand their bill during a panel discussion on telecommunications consumer issues. Consumer advocates attending the session were urged to become more active in consumer education efforts on telecommunications issues. A follow-up mailing to attendees is planned once the CALLS brochure has been printed.

The former members of Bell Atlantic’s Consumer Advisory Board (a group of 25 non-profit or constituency leaders representing a diverse cross-section of Bell Atlantic’s customer base) received briefings by corporate officers before the final approval of the CALLS plan, and received several mailings following the FCC adoption of the *Sixth Report and Order*. The *Sixth Report and Order*, and its reforms of access charges and universal service, will also be discussed with the new Verizon National Consumer Advisory board when it has its first meeting in October. Briefings are also planned for the New York Universal Design Committee (a panel composed of customers with disabilities and advocates from disability organizations) and the New York Consumer

Advisory Board (a 20 member panel representing numerous advocacy organization in New York). As other local and regional consumer panels are convened or reorganized in post-merger iterations, they too will be briefed. Members of these panels will be supplied with posters and brochures for distribution through their own channels.

“Leader Letters” including the CALLS consumer education information and materials will be mailed out in the Verizon states where this outreach to key community leaders is a routine operation, and will be included in on-going discussions that its external affairs staffs have with community leaders in their states. For example, Verizon’s Virginia company expects to contact more than 1,000 organizations and prominent community leaders; Verizon in Illinois, Indiana and Wisconsin will mail out to more than 200 leaders, and more than 400 leader letters will be sent in Florida. In addition, Verizon’s Florida company is scheduled to meet with more than 130 leaders in the next 30 days.

Verizon continues to hold follow-up discussions with the groups originally briefed by Verizon or other members of the CALLS coalition. Once Lifeline posters⁸⁵ and the FCC-approved CALLS brochures have been printed, they also plan mailings to other national and local advocacy groups, including groups such as the National Association of Area Agencies on Aging, the Association of Late Deafened Adults, LULAC, NAACP and Call for Action.

In addition to the third-party outreach efforts, Verizon will continue and expand their direct customer contacts on these topics. CALLS consumer education brochures will be available at Phone Mart stores in the former GTE territory, and will be handed out

⁸⁵ Discussed *infra* at pp. 38-39.

at the hundreds of local events that Verizon companies participate in each month (such as the Burlington County NJ Exhibits Expo, which attracts more than 1,000 participants; the “Abilities Expo,” which targets people with disabilities and expects 3,000 attendees in Boston in October; and the League of Municipalities meeting in New Jersey this November, which is expecting more than 10,000 attendees).

As Verizon responds to community requests for speakers, it will incorporate the CALLS consumer education information and materials into its presentation (as it has already done at talks in the Cranston, Westerly and Riverside Senior centers in Rhode Island this past July that reached more than 125 seniors and the Rotary Club meetings that Verizon-West Virginia CEO Gale Givens will be addressing this Fall).

Verizon media relations representatives continue to respond to CALLS-related requests from the media, and will work with local media contacts in an attempt to place public service advertisements and feature stories regarding phone service in local newspapers. For example, Verizon will be meeting with editorial boards at the Northwest Herald, Illinois State Journal, Bloomington Pentagraph and Carbondale South Illinoisan newspapers in Illinois, and has four editorial board meetings scheduled in Maine later this quarter.

Coincident with the CALLS education program, customers in Verizon’s former Bell Atlantic states are now receiving the company’s new “ExpressTrak” bill, which has received positive comments from consumers, consumer advocates and local and national regulators. The new bill format presents information in clear, easy to understand language, making it easier for customers to determine the components that make up their

total bill (and therefore better able to select plans and services that are the most appropriate for their usage patterns and budget).

E. Consumer Education Efforts with Independent Organizations.

An important part of the consumer education effort by CALLS and its member companies has been to enlist the assistance of independent organizations in providing consumers with telephone consumer information, including information on the access reform and universal service-related bill changes and on how to go about shopping for telecommunications services. Independent third parties can be a particularly effective means of consumer education because these organizations help to verify and add credibility to the information being presented to consumers. In addition, they generally can help focus the consumer information to that information which most helpful to a specific targeted audience.

The following are examples of efforts undertaken thus far by CALLS or CALLS members to work in partnership with third party public interest organizations to educate consumers:

- **American Association of Retired Persons (“AARP”)**: As previously discussed, AT&T participated in an AARP consumer education campaign.⁸⁶
- **American Association of Persons with Disabilities (“AAPD”)**: AAPD is a non-profit, non-partisan, cross-disability organization whose goals are unity, leadership and impact. AAPD recently published an article in its newsletter, which reaches 12,000 individuals and organizations interested in issues related to people with disabilities. Entitled "Lifeline Subscribers to See More Savings with Telephone Pricing Reform Plan,"⁸⁷ the article highlights the existence of the Lifeline program. The article also provides consumers with a list of phone tips, expressly drawn from the TRAC Phone Tips, advising consumers on how to assess their telecommunications needs, and to shop intelligently.

⁸⁶ See *supra* p. 15.

⁸⁷ Appendix D.1. The article is also available on the AAPD website at <http://www.aapd-dc.org>.

- **Alliance for Public Technology (“APT”)**: APT is a nonprofit coalition of consumer and public interest groups and individuals, whose mission is ensuring equitable access to telecommunications technology to all sectors of our society. APT will include CALLS article in APT’s September newsletter and will post messages on its membership listserv.⁸⁸
- **Consumer Action (“CA”)**: CA is a national nonprofit organization, specializing in providing information in many languages. CA is producing a new publication on reading phone bills funded by AT&T.
- **National Association for the Advancement of Colored People (“NAACP”)**: NAACP is the nation’s oldest and largest civil rights organization. CALLS members are coordinating with the NAACP for some telephone consumer education during their upcoming state conferences with local phone companies.
- **National Consumers League (“NCL”)**: NCL is a nationwide, not-for-profit consumer advocacy organization. NCL, with Verizon, has updated its online web-brochure “Understanding Your Phone Bill”⁸⁹ to reflect CALLS information. www.phonebillcentral.org links to the NCL website as a means of providing consumers with additional consumer education information.⁹⁰ CALLS continues to work with NCL to explore other means of educating consumers, and NCL will have an announcement or article in one of their newsletters. The NCL site has been accessed by over 232,000 consumers.
- **National Grange (“NG”)**: NG is the nation's oldest (founded in 1867) national agricultural organization, with grassroots units established in 3,600 local communities in 37 states. They will include CALLS article in the member newsletter, and have already promoted their activities with members. They are interested in promoting the websites and brochure.
- **Telecommunications and Research Action Center (“TRAC”)**: TRAC is a non-profit, membership organization that promotes the interests of residential telecommunications customers. TRAC has posted a press release on their website, and is listed on the back of the brochure.⁹¹
- **United Homeowners Association (UHA)**: UHA is a national, nonprofit, membership organization that represents the interests of homeowners based in Washington, D.C. UHA will post CALLS article on its website, and promote consumer information materials to its members.
- **United Seniors Health Cooperative (“USHC”)**: USHC is a nonprofit advocacy organization. In its Summer 2000 newsletter, USHC published an article entitled "Phone Rate Reform",⁹² describing the access reform and universal service-related telephone bill changes and suggesting four tips to consumers in assessing and shopping for telephone service. It also refers consumers to the National Consumer

⁸⁸ See Appendix D.2.

⁸⁹ Appendix D.3.

⁹⁰ <http://phonebillcentral.org/tips>.

⁹¹ See Appendix D.4.

⁹² Appendix D.5.

League website, to www.trac.org and to www.phonebillcentral.org, for additional information.

- **U.S. Hispanic Chamber of Commerce (“USHCC”)**: USHCC represents more than 100,000 small Hispanic business owners. CALLS is working with USHCC on an article focusing on consumer education for small businesses, which will be distributed by USHCC to its local chapters later this fall.

F. Consumer Education through the General Media.

CALLS produced a general consumer education article entitled "New Phone Bills are a Smart Step in the Right Direction,"⁹³ which provides consumers with a high level explanation of the changes in consumer bills that were being implemented after July 1, 2000. This article explains that nearly all consumers are now paying less as a result of these changes, when the telephone bill is considered as a whole. The article refers consumers to www.phonebillcentral.org or to a specified contact for further information. This article is currently being distributed to newspapers around the country. CALLS anticipates that this general consumer education article will run in hundreds of newspapers around the country, particularly in smaller areas.

CALLS has also produced a general consumer education article entitled "Smart Ways to Get the Most for Your Telecommunications Dollar"⁹⁴ that will be distributed to approximately 10,000 daily and weekly publications during September 2000. This short article focuses on quick tips to educate consumers on how to assess their calling needs. It includes questions asking consumers to examine the days, times of days, duration, and numbers to which most calls are placed, as well as whether calls are state-to-state, within state, or international. The article provides simple tips for comparing toll plans, and gives consumers the URLs for three web-based long distance calling plan comparison

⁹³ Appendix C.1.

⁹⁴ Appendix C.2.

tools www.trac.org, www.decide.com, www.getconnected.com. Again, CALLS anticipates that this second article will run in hundreds of newspapers around the country, particularly in smaller areas. A Lifeline/Link-Up promotion of similar proportions is in the pipeline.

G. Evaluation of Efforts.

With respect to the implementation of the *Sixth Report and Order* and associated changes in both local and long distance bills, the CALLS consumer education effort appears to have functioned well to address consumers' questions at the time they received their bills, and in providing additional sources of information for those consumers that had further questions. Consumers did not appear to have a strong negative reaction to these changes. For example, Verizon received only 13,000 customer inquiries regarding the CALLS-related changes from the 27 million residential customer access lines in its Bell Atlantic state footprint, and of these, had only 18 requests to escalate customer complaints.

Within BellSouth, the number of calls into the customer service centers regarding CALLS changes were also very low (approximately .2 percent of calls) and there were no requests to escalate customer complaints. The feedback from BellSouth's grassroots contacts was generally neutral to positive. Many groups and civic leaders were impressed with the potential savings (particularly in long distance) and the progress being made in simplifying the bill. Most consumers contacted appreciated being provided information about the changes, and had a positive response to the idea that they should expect to see a reduction in their overall telecommunications expense.

At the same time, an unprecedented number of consumers are being informed about their local and long distance telephone service options, and alerted to the fact that there are additional materials available to help them sort through the telecommunications marketplace.

III. PROMOTING AVAILABLE GOVERNMENT PROGRAMS THAT ASSIST LOW-INCOME IN OBTAINING TELEPHONE SERVICE

The members of CALLS agree that it is important to educate low-income consumers on the availability of federal Lifeline and Link-Up support that helps low-income consumers get and keep telephone service. To take advantage of its general consumer education efforts to promote Lifeline subscribership and usage of Link-Up, CALLS included discussions of Lifeline and/or Link-Up in its general consumer education materials discussed previously, including www.phonebillcentral.org, and the CALLS “Smart Consumer’s Guide to Telephone Service” brochure.

CALLS members sought, however, to do more to promote knowledge of and use of the Lifeline and Link-Up support programs. One of the difficulties in promoting Lifeline/Link-up is that both the benefits and the eligibility criteria vary from state to state, and to some extent from company to company. In order to provide a more efficient and effective means of providing low-income consumer and community organizations serving low-income individuals and families with information on eligibility criteria and enrollment, CALLS incumbent LEC members have enlisted the support of the United States Telecom Association in developing a nationwide Lifeline/Link-up website, www.lifelinesupport.org.

Although the low-income population is the least likely to have direct internet access, an important target audience for this Lifeline/Link-Up consumer education

program is public assistance, social welfare and community-based organizations that work with low-income populations. Our objective is for the USTA website to be a primary, easy to use reference for use by public assistance, social welfare and community-based organizations, but also for it to be simple enough and consumer-friendly enough for use by individual low income consumers as well.

This type of information resource for Lifeline/Link-up is unprecedented. In some states, individual state commissions posted Lifeline/Link up eligibility criteria and benefits on the state public utility commission web page. However, this did not appear to be true for most state commission websites. In addition, because each page was done individually by each Commission, there was no standardization of the format and information provided.

Creating a central web-based resource point has significant advantages. The material can be presented in a consumer-friendly, but standardized manner. Individual companies, third party groups and federal, state and local governmental agencies can promote a single reference point. The information, however, also can be highly tailored to reflect variations by state or company, so that the fact that there are variations does not force a consumer to wade through information unnecessary to his or her particular circumstances or force the information to be generalized to the point where it is not longer specific enough to be of use. Our objective is to fill a clear need for information about Lifeline, and to provide a central resource point that can be centrally promoted, but still convey the type of state and company specific information necessary to enable a customer to sign up for Lifeline and to understand the benefits he or she is getting.

In order to raise awareness of the Lifeline and Link-up programs, CALLS and its member companies are producing and printing a poster that can be distributed to low income service offices, libraries, and community organizations around the country. 10,000 copies of this poster are being printed, and the CALLS member companies will be distributing the poster. Electronic versions (.pdf) of the Lifeline poster will also be available in both English and Spanish. Large print is being used to make the poster accessible to individuals with limited vision. In many areas, the posters will be customized with local contact information.

CALLS also included descriptions of Lifeline and Link-up and the www.lifelinesupport.org site in the general consumer information brochure being distributed by the companies and through the Federal Consumer Information Center.

CALLS companies will also make the posters and other Lifeline materials available electronically to their state and local consumer and community relations personnel around the country, who will further distribute these materials. These materials will be placed in the lobbies of assistance organizations, company payment centers, and community centers, among others, and in many cases will be enhanced with direct local contact information.

BellSouth-Tennessee, for example, is working with the Association of Non-Profit Executives to add Lifeline information to that organization's website. In North Carolina, BellSouth is working with an Attorney General-led committee to promote Lifeline and Link-Up, which is producing a promotional brochure. That brochure will include information related to the *Sixth Report and Order*. BellSouth is also running a pilot project in Wake County, N.C. to distribute Lifeline information through the school lunch

assistance program. If successful, the Wake County project will be a prototype for distribution in the rest of North Carolina. www.lifelinesupport.org will also be promoted in BellSouth's newsletter-style bill insert article entitled "Low Income Assistance Information is Now Online", which will be mailed to all business and residential customers in November and December 2000.

SBC will also be making a concerted effort to publicize Lifeline and Link-up to low income consumers, and particularly the availability of enhanced Lifeline support for income-eligible individuals on Native American Reservations. SBC will use the CALLS consumer education brochure distributed through the Federal Consumer Information Center and the CALLS websites to ensure that a uniform message is delivered throughout its 13 states.⁹⁵

The Sprint local companies provided information and promoted the availability of state and federal Lifeline assistance programs to customers in several states, including Minnesota, Nebraska, Wyoming, Kansas, Missouri, and Texas through bill inserts.⁹⁶

Verizon similarly will be working with its contacts in local and national non-profit organizations to help spread Lifeline and Link-Up information to consumers. Information on these topics is already included in the "Customer Guide" pages of consumer telephone directories. As opportunities arise, Verizon will also include Lifeline-related messages in the regularly scheduled inserts and newsletters that some of our companies include in their bills. For example, an article on Lifeline was included in their July New York "Extra" newsletter inserted in every bill, and many Verizon companies have regularly scheduled bill imprints or inserts about Lifeline and Link-Up

⁹⁵ Additional information concerning SBC's efforts to promote Lifeline is attached at Appendix E.3.d.

⁹⁶ See Appendix E.4.i.

throughout the year. Many of the Verizon states also routinely provide Lifeline and Link-Up information as a part of the service order dialogue for new connects and service changes.

As a normal part of Verizon customer outreach sessions, Lifeline and Linkup are discussed when appropriate. Over the past two years, Verizon's Pennsylvania company alone has distributed more than 65,000 English language and 31,000 Spanish language brochures on Lifeline/Linkup, and contacted more than 400 organizations in the state. Verizon-Delaware also has a Lifeline brochure, and its D.C., New Jersey and Pennsylvania companies have Lifeline information on their web pages. In addition, in Illinois, Verizon sits on the board of the Universal Telephone Assistance Corporation, an industry/consumer group that educates consumers about Lifeline service availability. Verizon and the Verizon Foundation are also key sponsors of the Indian Telecommunications Training Initiative (ITTI 2000) conference which will offer key telecommunication information (including Lifeline and Linkup education) to tribal leaders from the 579 federally recognized Native American tribes later this month.

AT&T continues to maintain its voluntary Lifeline Plan for Long Distance Customers, through which AT&T voluntarily waives its USF fee for Lifeline customers. This can be a significant benefit for low income consumers, especially because AT&T has converted its flat rate USF fee into a percentage fee. Some low income consumers still have significant long distance bills, so reducing those bills by the amount of the percentage USF charge (currently 8.6%) is a significant savings for those consumers. AT&T has used direct mailing to advise its basic schedule customers about its Lifeline plan. AT&T's Lifeline program is included in the customer service scripts and the

consumer has the ability to enroll in the plan directly with the customer service representative. The Lifeline plan is also included on the AT&T web page.

Once the www.lifelinesupport.org site is up and running, CALLS will be contacting federal agencies, members of Congress, NASUCA, NARUC, individual state commissions, and consumer organizations to more directly enlist their support in making sure that this important resource is used by or on behalf of low income consumers.

CALLS is also preparing to distribute to general media an article describing Lifeline and Link-up programs and describing the new resources available through www.lifelinesupport.org. We anticipate that these articles will run in general media publications around the country, particularly in small towns.

We believe that www.lifelinesupport.org will be an important step forward for Lifeline education, and a critical fundamental tool for all parties interested in promoting telephone subscribership among low income Americans. We hope that the FCC, other federal agencies, state commissions, state utility consumer advocates, and community organizations can integrate this resource into their own consumer education efforts.

IV. CONCLUSION

CALLS and its members have worked with the Consumer Information Bureau to develop a consumer education plan that has reduced consumer bill confusion, and is providing consumers with valuable information on how to understand their phone bill and how to inventory their telecommunications needs. In addition, CALLS' members, together with USTA will create the first-ever comprehensive Lifeline/Link-up benefits and eligibility database, which will greatly improve Lifeline/Link-up educational efforts.

Respectfully submitted,

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