

November 10, 2010

Joel Gurin  
Chief, Consumer and Government Affairs Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Mr. Gurin:

The Consumer Advisory Committee (“CAC”) thanks you for the opportunity to respond to the recommendation from Nebraska Public Service Commissioner Anne Boyle to develop a federal-state collaboration to assist consumers resolve a full range of telecommunications complaints. Commissioner Boyle initially directed this request to Austin Schlick, General Counsel for the Federal Communications Commission who forwarded the recommendation to your Bureau.

The CAC recognizes the value of Commissioner Boyle’s recommendation to provide a process for consumers to have their complaints resolved in an efficient manner. While we recognize that there are jurisdictional restrictions on the ability of some states to handle certain types of telecommunications complaints, the concept of creating a process whereby the federal and state governments can coordinate their efforts to assist consumers in resolving their complaints merits further review.

In an effort to establish this process, the CAC proposes the following recommendations:

- First, the CAC should formally thank Commissioner Boyle for seeking to establish innovative solutions to improve the complaint resolution process through a federal-state joint process.
- Second, the CAC recommends the FCC initiate research through NARUC or other organizations to determine what the current status is with regards to complaint handling, mediation, and resolution at the various state regulatory commissions.

Specifically, there needs to be a clear understanding of the following questions:

- Are there jurisdictional restrictions on a PUC's ability to mediate certain classes of service?
- What resources do state utility regulatory agencies have to handle complaints? What burdens would forwarding FCC complaints to them create?

- What metrics do the FCC and state utility regulatory agencies use or need to use to measure the effectiveness of the complaint resolution process?
  - What kind of communications already exist between the FCC and state utility regulatory agencies in the context of consumer complaints and what methods should be undertaken to improve these communications?
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- Third, the next CAC will review the findings of the research conducted and work with the FCC on future steps.
  - Fourth, the FCC should create and maintain a public-facing list of contacts at the state and federal levels for consumers to consult to determine the agency best suited to address their particular telecommunications complaints.
  - Finally, the CAC recommends that an examination of how the consumer complaint process at the state and FCC levels could be improved be a priority for the next term of the CAC.

The CAC views the process of establishing a federal-state collaborative to facilitate the resolution of consumer complaints to be a valuable asset for consumers. Taken together, the foregoing recommendations will provide a solid base of knowledge from which this collaborative process can progress.

Sincerely,

Debra Berlyn  
Chair, FCC Consumer Advisory Committee