

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Protecting Consumers From)
Unauthorized Carrier Changes and) CG Docket No. 17-169
Related Unauthorized Charges)

Comments of

**Consumers Union
Consumer Action
Consumer Federation of America
National Association of Consumer Advocates
National Consumer Law Center, on behalf of its low-income clients
National Consumers League
Public Citizen
Public Knowledge**

September 13, 2017

Consumers Union, Consumer Action, Consumer Federation of America, National Association of Consumer Advocates, National Consumer Law Center on behalf of its low-income clients, National Consumers League, Public Citizen, and Public Knowledge applaud the Federal Communications Commission (FCC) for pursuing this rulemaking to ease the problem of “slamming,” in which a customer’s long-distance carrier is changed without his or her knowledge, as well as the problem of “cramming”—when a third party enters unauthorized charges into a consumer’s phone bill.¹ Though the FCC has examined cramming and slamming several times over the last ten years,² and has extended important protections to consumers—for example, requiring carriers to list third-party charges separately on bills, and to inform customers if they offer a service to block third-party charges,³ regulatory gaps persist. For example, most cramming and slamming consumer protections extend only to consumers with traditional landline phones⁴—an increasingly smaller portion of the population.⁵

Because cramming and slamming continue to plague consumers, we urge the FCC to take a comprehensive approach to these problems, and extend the strongest possible protections against these types of fraud to all voice customers—whether they use a traditional landline, Voice over IP (VoIP) service, or a pre- or post-paid cell phone. The following points reflect

¹ Protecting Consumers from Unauthorized Carrier Changes and Related Unauthorized Charges, Proposed Rules, 82 Fed. Reg. 37830 (Aug. 14, 2017) ¶ 1-2, *available at* <https://www.gpo.gov/fdsys/pkg/FR-2017-08-14/pdf/2017-16961.pdf> [hereinafter “NPRM”].

² See, for example, Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges, Proposed Rules, 76 Fed. Reg. 52625 (Aug. 23, 2011), *available at* <https://www.gpo.gov/fdsys/pkg/FR-2011-08-23/pdf/2011-21547.pdf>; Empowering Consumers To Prevent and Detect Billing for Unauthorized Charges, Proposed Rules, 78 Fed. Reg. 61250 (Oct. 3, 2013), *available at* <https://www.gpo.gov/fdsys/pkg/FR-2013-10-03/pdf/2013-24295.pdf>; In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Fourth Report and Order, FCC 07-223, CG Docket No. 94-129 (Jan. 9, 2008), *available at* https://apps.fcc.gov/edocs_public/attachmatch/FCC-07-223A1.pdf.

³ See 47 CFR §§ 64.2400-64.2401 for the FCC’s Truth-In-Billing requirements. While FCC rules currently do not include a specific prohibition against cramming, the new proposed rules would codify such a ban. See NPRM, *supra* note 1, at 7. However, the FCC has initiated enforcement actions against cramming using its authority to stop “unjust and unreasonable” charges and practices under the Communications Act. See 47 U.S.C. § 201(b); Fed. Commc’ns Comm’n, AT&T Mobility to Pay \$105 Million to Resolve Wireless Cramming and Truth-In-Billing Investigation (Oct. 8, 2014), https://apps.fcc.gov/edocs_public/attachmatch/DOC-329830A1.pdf. In addition, the Federal Trade Commission (FTC) has used its Unfair and Deceptive Acts and Practices authority to engage in enforcement actions against cramming. See 15 U.S.C. § 45(a); FTC v. T-Mobile USA, No. 2:14-cv-00967-JLR (W.D. Wash. Dec. 19, 2014) (stipulated proposed order for permanent injunction). The rules addressing slamming are more extensive. For example, the FCC requires carriers to obtain the authorization of the consumer, and verification of that authorization, before submitting a request to switch carriers. The consent can be obtained in writing, electronically through a toll-free number, or through the use of a third party verification service (TPV) to confirm the customer’s verbal authorization. See 47 CFR § 64.1120; Fed. Commc’ns Comm’n, Slamming Policy (last updated Dec. 8, 2015), <https://www.fcc.gov/general/slamming-policy>.

⁴ NPRM, *supra* note 1, at ¶ 6-7.

⁵ FED. COMM’NS COMM’N, INDUSTRY ANALYSIS AND TECHNOLOGY DIVISION, WIRELINE COMPETITION BUREAU, VOICE TELEPHONE SERVICES: STATUS AS OF JUNE 30, 2016 2 (April 2017), *available at* https://apps.fcc.gov/edocs_public/attachmatch/DOC-344500A1.pdf [hereinafter “VOICE TELEPHONE SERVICES”].

positions we have taken during our years of advocacy on these issues, as well as steps recommended by the Federal Trade Commission to address mobile cramming.⁶ We propose that the FCC:

- extend cramming and slamming protections to all voice customers, including landline, cell (prepaid and postpaid), and VoIP;
- codify rules to prohibit cramming and misrepresentations in sales calls;
- ban most third-party charges on wireline and VoIP, with only a few exceptions, and block wireless third-party charges, unless the consumer provides his or her express, written consent;
- require voice providers to offer a free opt-in to block all third-party charges, and require clear and prominent notice to all consumers of the option;
- establish, and require companies to comply with, a process so that consumers can easily reverse fraudulent charges;
- require voice providers to “freeze” the long-distance carrier for all of their customers by default;
- require providers to record the entire sales call preceding a carrier change; and
- require forwarding of cramming and slamming complaints to the FCC, and share that data with the Federal Trade Commission (FTC).

By pursuing these reforms, the FCC can help ensure that consumers receive strong protections, not only against fraudulent phone charges, but against relentless, deceptive telemarketers that violate consumers’ right to privacy.

Extend cramming and slamming protections to all voice customers, including landline, cell (prepaid and postpaid), and VoIP.

Consumer groups have long argued that all consumers deserve protection from cramming, and that slamming protections should be extended to VoIP customers.⁷ Regrettably, most existing safeguards apply only to traditional landline users.⁸ First and foremost, the FCC

⁶ See, for example, FED. TRADE COMM’N, MOBILE CRAMMING: AN FTC STAFF REPORT (July 2014), *available at* <https://www.ftc.gov/system/files/documents/reports/mobile-cramming-federal-trade-commission-staff-report-july-2014/140728mobilecramming.pdf>; Comments of Consumers Union, CG Docket No. 11-116 (Nov. 18, 2013), *available at* <https://ecfsapi.fcc.gov/file/7520958664.pdf> [hereinafter “Comments of Consumers Union”]; Comments of Consumers Union et al., CG Docket No. 11-116 (June 25, 2012), *available at* <https://ecfsapi.fcc.gov/file/7021977710.pdf> [hereinafter “Comments of Consumers Union et al.”]; Reply Comments of Consumers Union et al., CG Docket No. 11-116 (July 20, 2012), *available at* <https://ecfsapi.fcc.gov/file/7021991046.pdf> [hereinafter “Reply Comments”].

⁷ Consumer Federation of America et al., CFA Group Letter to FCC in Support of Greater Protections Against Cramming (April 23, 2012), *available at* <http://consumerfed.org/testimonial/cfa-group-letter-to-fcc-in-support-of-greater-protections-against-cramming/>; Comments of Consumers Union and Consumer Federation of America, WC Docket No. 04-36 14 (July 14, 2004), *available at* <https://ecfsapi.fcc.gov/file/6516283900.pdf>.

⁸ NPRM, *supra* note 1, at ¶ 6-7.

should extend comprehensive cramming and slamming protections to all voice customers, regardless of their type of phone service.

All voice customers are susceptible to fraudulent charges. In fact, in recent years, consumers have filed significantly more complaints about cramming to wireless phone service than to traditional wireline. Since October 2014, consumers have filed more than 6,500 complaints to the FCC about cramming to a wireless account.⁹ In that same time period, more than 2,280 complaints were filed about cramming to “wired” phones.¹⁰ The FCC also received in excess of 400 complaints about fraudulent charges to a VoIP line.¹¹

While the vast majority of slamming complaints to the FCC since October 2014 relate to wireline service,¹² several complaints have been filed regarding wireless and VoIP service as well.¹³ In fact, regulatory gaps have hindered the FCC in taking action against VoIP providers engaging in slamming. In 2009, the FCC found that a VoIP provider had allegedly engaged in slamming. It reversed the decision after concluding that the slamming rules did not cover VoIP service.¹⁴

As consumers and providers increasingly drop traditional landline service in favor of wireless and VoIP service, it’s likely that even more customers will be defrauded when using these alternative voice services. Already, wireless subscribers outnumber landline subscribers. FCC data reveals that in 2016, there were nearly 338 million mobile phone subscriptions, 62 million switched access lines, and about 60 million VoIP subscriptions.¹⁵ VoIP and wireless customers, as a significant portion of the voice market, deserve protection from unauthorized third-party charges.

Codify rules to prohibit cramming and misrepresentations in sales calls.

We agree with the FCC that codifying prohibitions against cramming and telemarketer misrepresentation will aid in enforcement against fraud.¹⁶

⁹ Fed. Commc’ns Comm’n, FCC Open Data, <https://opendata.fcc.gov/Consumer/Cramming-data-wireless/3wbw-zatz/data>, (accessed Sept. 10, 2017).

¹⁰ Fed. Commc’ns Comm’n, FCC Open Data, <https://opendata.fcc.gov/Consumer/Cramming-data-wired/vhnx-i42w/data>, (accessed Sept. 10, 2017).

¹¹ Fed. Commc’ns Comm’n, FCC Open Data, <https://opendata.fcc.gov/Consumer/Cramming-data-VoIP/ka2g-nfzz/data>, (accessed Sept. 10, 2017).

¹² Fed. Commc’ns Comm’n, FCC Open Data, <https://opendata.fcc.gov/Consumer/Slamming-data-wired/8djj-i5sk/data>, (accessed Sept. 10, 2017).

¹³ Fed. Commc’ns Comm’n, FCC Open Data, <https://opendata.fcc.gov/Consumer/Slamming-data-wireless/d6vs-4rj6/data> (wireless data); Fed. Commc’ns Comm’n, FCC Open Data, <https://opendata.fcc.gov/Consumer/Slamming-data-VoIP/ex6d-hhs4/data> (VoIP data) (last visited Sept. 10, 2017).

¹⁴ In the Matter of Mediacom Complaint Regarding Unauthorized Change of Subscriber’s Telecommunications Carrier, Order of Reconsideration, DA 09-1093, IC No. 08-S0294769 ¶ 7 (May 19, 2009), *available at* https://apps.fcc.gov/edocs_public/attachmatch/DA-09-1093A1.pdf.

¹⁵ VOICE TELEPHONE SERVICES, *supra* note 5, at 2.

¹⁶ NPRM, *supra* note 1 at ¶ 6.

First, we support the FCC’s proposal to adopt language that explicitly bans and voids verbal authorization of a carrier switch in the case of “misrepresentation and/or deception on the sales call[.]”¹⁷ A recent enforcement action highlights the link between deceptive telemarketing and fraudulent carrier switches. In April, the FCC fined Advantage Telecommunications \$1 million for adding long distance service to consumers’ phone bills without their permission.¹⁸ And in 2016, a consumer told a local news station that his long-distance carrier was switched without his authorization—he had been recorded assenting to a question, but was not aware that it would be used to authorize a carrier switch.¹⁹ Clarifying that this deception is illegal will give the FCC additional tools to hold fraudulent actors accountable for slamming.

We also strongly support adding language to the Truth-In-Billing Requirements to specifically prohibit “charges that have not been authorized by the subscriber.”²⁰ The FCC has implemented several important protections to help address cramming. For example, it requires carriers to place third-party charges in a separate section of the landline bill.²¹ It has also been able to take action against cramming under its existing authority to address “unjust and unreasonable” charges and practices.²² However, the FCC has not yet codified a rule to prohibit cramming.

A series of high-profile enforcement actions returned millions of dollars to consumers and demonstrates how important it is to give federal agencies the tools they need to stop fraud. For example, in 2014, the FTC, along with the FCC, all 50 states, and the District of Columbia, announced multi-million dollar settlements with AT&T and T-Mobile for reaping millions of dollars from third-party cramming charges.²³ The FCC, the Consumer Financial Protection Bureau (CFPB), and state attorneys general have fined Sprint and Verizon over \$150 million for authorizing fraudulent charges to consumers’ wireless accounts.²⁴ And last year, the FCC fined

¹⁷ *Id.* at 37838.

¹⁸ Fed. Commc’ns Comm’n, FCC Fines Company \$1 Million for Illegally Switching Consumers’ Long Distance Carriers (April 27, 2017), https://apps.fcc.gov/edocs_public/attachmatch/DOC-342164A1.pdf.

¹⁹ *Call Kurtis: Why You May Not Want to Say a Word on an Unexpected Call*, CBS13 (April 20, 2016), <http://sacramento.cbslocal.com/2016/04/20/call-kurtis-how-to-prevent-companies-from-cramming-your-phone-bill/>.

²⁰ NPRM, *supra* note 1, at 37838.

²¹ 47 CFR §§ 64.2400-64.2401.

²² See 47 U.S.C. § 201(b); Fed. Commc’ns Comm’n, AT&T Mobility to Pay \$105 Million to Resolve Wireless Cramming and Truth-In-Billing Investigation (Oct. 8, 2014), https://apps.fcc.gov/edocs_public/attachmatch/DOC-329830A1.pdf.

²³ Fed. Trade Comm’n, T-Mobile to Pay At Least \$90 Million, Including Full Consumer Refunds (Dec. 19, 2014), *available at* <https://www.ftc.gov/news-events/press-releases/2014/12/t-mobile-pay-least-90-million-including-full-consumer-refunds>; Fed. Trade Comm’n, AT&T to Pay \$80 Million to FTC for Consumer Refunds in Mobile Cramming Case (Oct. 8, 2014), *available at* <https://www.ftc.gov/news-events/press-releases/2014/10/att-pay-80-million-ftc-consumer-refunds-mobile-cramming-case>.

²⁴ Consumer Fin. Protection Bureau, CFPB Takes Action to Obtain \$120 Million in Redress from Sprint and Verizon for Illegal Mobile Cramming (May 12, 2015), <https://www.consumerfinance.gov/about-us/newsroom/cfpb-takes-action-to-obtain-120-million-in-redress-from-sprint-and-verizon-for-illegal-mobile-cramming/>.

AT&T for allowing third parties to add fraudulent charges for “directory assistance service,” into customers’ landline bills without their permission.²⁵

It is also particularly important to secure strong consumer protections against cramming because it has a disproportionate impact on members of communities of color. A survey conducted in 2012 found that “Over a third of both African-Americans (35%) and Latinos (34%) report that they have been victims of cramming[.]”²⁶ Clearly, the FCC should have all of the necessary tools at its disposal to crack down on these fraudulent practices.

Ban most third-party charges on wireline and VoIP, with only a few exceptions, and block wireless third-party charges, unless the consumer provides his or her express, written consent.

The FCC should take additional steps to protect consumers from fraudulent charges. While several of the major providers have already moved to block by default many of the charges that are most commonly used for cramming to landline phones, it is time for the FCC to codify those protections.

There is little evidence that consumers benefit from third-party non-telecommunications services for landline phones. In fact, the FTC noted in 2011 that they have found “very few legitimate uses of third-party telephone billing.”²⁷ In 2012, recognizing that so-called “premium” services like voicemail, email, and web hosting were linked to cramming, AT&T, Verizon, and CenturyLink vowed to phase out third-party billing for these services to landlines.²⁸ However, compliance remains voluntary.

To ensure that all customers receive guaranteed protections, the FCC should require carriers to ban all non-telecommunications third-party charges to landline and VoIP lines, with only a few exceptions. Consumers should have the option to use services directly related to the phone service, such as collect calls, operator assistance, and inmate calling after providing their informed, written consent.²⁹ The consumer should be allowed to easily rescind consent to third-party telecommunications charges at any point. And in the case of a recurring charge, the customer’s voice provider must be required to inform the customer every time a recurring charge is placed on the bill.

²⁵ Fed. Comm’n Comm’n, AT&T to Pay 7.75 Million for Letting Scammers Bill Consumers for Sham ‘Directory Assistance’ Services (Aug. 8, 2016), https://apps.fcc.gov/edocs_public/attachmatch/DOC-340650A1.pdf.

²⁶ ANZALONE LISZT RESEARCH, AFRICAN-AMERICAN AND LATINO CONSUMERS CONCERNED ABOUT ABUSIVE CELL PHONE BILLING PRACTICES (June 15, 2012), in Reply Comments, *supra* note 6, at 21.

²⁷ Comment of the Federal Trade Commission, CG Docket No. 11-1163 (Oct. 2011), *available at* https://www.ftc.gov/sites/default/files/documents/advocacy_documents/ftc-comment-federal-communications-commission-concerning-placement-unauthorized-charges-telephone.11-116-09-158-and-98-170/111227crammingcomment.pdf.

²⁸ *Beware of Bogus Phone-Bill Fees*, CONSUMER REPORTS (August 2012), <https://www.consumerreports.org/cro/magazine/2012/08/beware-of-bogus-phone-bill-fees/index.htm>.

²⁹ Comments of Consumers Union et al., *supra* note 6, at 17.

We recognize that there may be third-party services that wireless customers want to use.³⁰ However, as evidenced by the recent enforcement actions against AT&T, T-Mobile, Sprint, and Verizon, wireless customers are just as vulnerable to cramming charges as are landline customers. In 2014, many wireless companies even eliminated most third-party charges for “premium SMS,” costly text messages with content such as celebrity gossip and horoscopes, due to abuses related to those services.³¹ Wireless customers should be able to select the services they would like to use, and at the same time, remain protected from unauthorized charges.

Therefore, the FCC should require voice providers to obtain informed written consent from the consumer before permitting third-party charges to their wireless bills. Providers should offer the same protections as outlined above to help prevent fraudulent recurring charges: consumers should be able to opt-out of these charges at any time, and the primary voice provider should notify the customer every time a recurring charge is included in his or her telephone bill.

Require voice providers to offer a free opt-in to block all third-party charges, and require clear and prominent notice to all consumers of the option.

Some consumers may want to take even more comprehensive steps to protect themselves from third-party charges. Many major phone companies now offer customers the ability to opt-in to block at least some third-party charges, at no charge.³² However, consumers are not always given the option to block all third-party charges.³³

We recommend that the FCC codify the voluntary practice of many carriers and require them to offer a free, opt-in service to block all third party charges. This is important, because fraudsters have inserted charges into consumers’ bills even without authorization. Though many wireless providers ask consumers to provide two forms of consent to access third party services, bad actors have found ways to continue to place unauthorized charges on consumers’ bills.³⁴ Requiring carriers to implement proactive blocking methods for all consumers will provide them additional security against these types of charges.

³⁰ Comments of Consumers Union, *supra* note 6, at 4.

³¹ COMMITTEE ON COMMERCE, SCIENCE, AND TRANSPORTATION, CRAMMING ON MOBILE PHONE BILLS: A REPORT ON WIRELESS BILLING PRACTICES, STAFF REPORT FOR CHAIRMAN ROCKEFELLER 10 (July 30, 2014), *available at* https://www.commerce.senate.gov/public/_cache/files/1690f9da-2040-455a-8801-3f1969b796f2/BBBB4B24F8FB5B29619A25536E5A135C.cramming-report-final.pdf; Fed. Trade Comm’n, FTC Alleges T-Mobile Crammed Bogus Charges onto Customers’ Phone Bills (July 1, 2014), <https://www.ftc.gov/es/node/412191>.

³² Joel Gurin, Unauthorized Fees: What’s Hiding in Your Phone Bill? FCC Blog (July 12, 2011), <https://www.fcc.gov/news-events/blog/2011/07/12/unauthorized-fees-whats-hiding-your-phone-bill>.

³³ See, for example, CenturyLink, Blocking Select 3rd Party Charges (accessed September 13, 2017), <http://www.centurylink.com/common/popups/residential/third-party-calling.html>. CenturyLink notes that the opt-in block will prevent “some third party charges.”

³⁴ David Segal, *To Stop Cellphone Cramming, Don’t Let It Start*, THE NEW YORK TIMES (April 7, 2012), <http://www.nytimes.com/2012/04/08/your-money/cellphone-cramming-gets-a-second-look.html?mcubz=0>; Comments of Consumers Union, *supra* note 6, at 4-5.

In addition, it is important that all consumers be made aware of these protections. While providers are already required to notify landline customers of the blocking opt-in on their bills, at the point of sale, and prominently on the voice provider's website, these protections should be extended to all voice customers.³⁵

Establish, and require companies to comply with, a process that enables consumers to easily reverse fraudulent charges.

Consumers should not be held responsible for or have their credit damaged because of fraudulent charges placed on their phone bills. The FCC should outline a process for consumers to rid themselves of fraudulent cramming charges. The process should follow five principles, which reflect the process established with regard to slamming³⁶: It should be free; it should be clearly laid out for consumers upon purchase of the third-party service and in their phone bills; consumers must be able to withhold payment of the fraudulent charge with no penalty while the issue is being investigated; and for the duration of the investigation, the voice provider may not report or threaten to report the consumer to collection agencies or credit bureaus. In addition, if the customer has already paid the fraudulent charge, it must be refunded within two billing cycles.³⁷ Establishing a process that follows these principles will help protect consumers from additional costs related to fraudulent cramming.

Require phone companies to “freeze” the long-distance carrier for all of their customers by default.

The FCC has proposed to help prevent “slamming” by requiring voice providers to lock in the consumer's long-distance carrier by default. Consumers will retain the option to lift the “freeze” at any time.³⁸ Phone companies may offer an opt-in freeze, but are not required to do so.³⁹ Because of the complaints and enforcement actions related to slamming outlined above, we agree that more protections against slamming are needed. We recommend that the FCC require this default freeze, and extend the protections to all customers, including VoIP, wireless, (both prepaid and postpaid), and traditional landline customers. Still, care must be taken so that a consumer may easily switch phone providers if they would like. The FCC should stipulate that carriers may not charge customers to lift or re-apply a freeze.

³⁵ 47 CFR §§ 64.2400-64.2401; Fed. Comm'n's Comm'n, FCC Adopts Rules to Help Consumers Identify and Prevent Unauthorized Mystery Fees, Known as “Cramming,” on Phone Bills (April 27, 2012), https://apps.fcc.gov/edocs_public/attachmatch/DOC-313803A1.pdf.

³⁶ 47 CFR § 64.1160.

³⁷ Comments of Consumers Union et al., *supra* note 6, at 17.

³⁸ NPRM, *supra* note 1, at ¶ 8.

³⁹ 47 CFR § 64.1190.

Require providers to record the entire sales call preceding a carrier change.


Fraudulent telemarketers often record a customer’s assent to a question and use that as verification of authorization of a carrier switch. We agree with the FCC that reform of the process for third party verification of a carrier switch is warranted. Carriers currently have the option to use a third-party verification service to authorize a verbal request. For example, the agent may begin a conference call with the verification service and the consumer, which must be “recorded in [its] entirety.”⁴⁰ We support the FCC’s proposal to also require the submitting carrier to record the entire sales call before the carrier change.⁴¹ This should help reduce fraudulent misrepresentation of verbal authorization to confirm carrier switches.

Require voice providers to forward cramming and slamming complaints to FCC, and share that data with the FTC.

While the FCC’s public complaint database reveals that many consumers continue to file complaints directly with the FCC in the case of fraudulent charges and carrier switches, it is important that the appropriate federal agencies be more fully aware of all of the complaints about cramming and slamming. Thus, where they are not already required to do so, the FCC should require carriers to forward the complaints they receive about slamming and cramming to them. In turn, the FCC should forward these complaints to the FTC, so that they can take action if appropriate. This will help ensure that the authorities have the information they need to enforce restrictions against these fraudulent practices.

Thank you again for your efforts to protect consumers from deceptive and invasive telemarketing that compromises consumers’ privacy, as well as the related fraudulent charges and carrier switches.

Respectfully submitted,



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⁴⁰ 47 CFR § 64.1120.

⁴¹ NPRM, *supra* note 1, at ¶ 24.

Descriptions of the Organizations Joining this Filing

Consumers Union is the public policy and mobilization division of Consumer Reports. Consumers Union works for a fair, just, and safe marketplace for all consumers and to empower consumers to protect themselves, focusing on the areas of telecommunications, health care, food and product safety, energy, and financial services, among others. Consumer Reports is the world's largest independent product testing organization. Using its more than 50 labs, auto test center, and survey research center, the nonprofit organization rates thousands of products and services annually. Founded in 1936, Consumer Reports has over 8 million subscribers to its magazine, website, and other publications.

Consumer Action has been a champion of underrepresented consumers since 1971. A national, nonprofit 501(c)3 organization, Consumer Action focuses on financial education that empowers low to moderate income and limited-English-speaking consumers to financially prosper. It also advocates for consumers in the media and before lawmakers and regulators to advance consumer rights and promote industry-wide change particularly in the fields of credit, banking, housing, privacy, insurance and telecommunications. www.consumer-action.org

The Consumer Federation of America is an association of more than 250 nonprofit consumer groups that was established in 1968 to advance the consumer interest through research, advocacy and education.

The National Association of Consumer Advocates (NACA) is a nonprofit association of consumer advocates and attorney members who have represented hundreds of thousands of consumers victimized by fraudulent, abusive and predatory business practices. NACA is actively engaged in promoting a fair and open marketplace that forcefully protects the rights of consumers, particularly those of modest means.

National Consumer Law Center (NCLC) is a non-profit corporation founded in 1969 to assist legal services, consumer law attorneys, consumer advocates and public policy makers in using the powerful and complex tools of consumer law for just and fair treatment for all in the economic marketplace. NCLC has expertise in protecting low-income customer access to telecommunications, energy and water services in proceedings at the FCC and state utility commissions and publishes Access to Utility Service (5th edition, 2011) as well as NCLC's Guide to the Rights of Utility Consumers and Guide to Surviving Debt.

The National Consumers League, founded in 1899, is America's pioneer consumer organization. Our mission is to protect and promote social and economic justice for consumers and workers in the United States and abroad. For more information, visit www.nclnet.org.

Public Citizen is a national nonprofit organization with more than 400,000 members and supporters. We represent consumer interests through lobbying, litigation, administrative advocacy, research, and public education on a broad range of issues including consumer rights in the marketplace, product safety, financial regulation, safe and affordable health care, campaign finance reform and government ethics, fair trade, climate change, and corporate and government accountability.

Public Knowledge is a nonprofit policy and public interest organization that promotes competition and consumer protection on technology, telecommunications, and intellectual property issues.