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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: P2P Alliance Petition for Clarification
Notice of *ex parte* presentation, CG Docket No. 02-278

Dear Ms. Dortch:

On March 6, 2019 and on behalf of the P2P Alliance ("Alliance"), I met with Michael Scurato, Legal Advisor to Commissioner Geoffrey Starks. In our meeting, I introduced the P2P Alliance, a coalition of peer-to-peer ("P2P") text messaging service providers and users of P2P texting platforms. I explained that P2P texting allows organizations to communicate with students, employees, neighborhood residents, voters, and customers through individualized, person-to-person text messages that provide individuals with timely, relevant information.

Consistent with the Alliance's pending petition,¹ I requested that the Commission clarify that use of P2P text messaging is not subject to the Telephone Consumer Protection Act of 1991² because such texts are manually sent from one individual to another. P2P text messaging requires one person to actively and affirmatively transmit each message one-at-a-time to each recipient. And, thereafter, the sender and the recipient both benefit from the ability to continue their unique dialogue.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced docket. Please contact me directly with any questions.

Sincerely,

/s/

Angela E. Giancarlo
Counsel to P2P Alliance

cc: Michael Scurato

¹ See *Consumer and Governmental Affairs Bureau Seeks Comment on the P2P Alliance Petition for Clarification Under the Telephone Consumer Protection Act*, Public Notice DA 18-547 (rel. May 23, 2018).

² 47 USC § 227.

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