

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

# Channing L. Bete Co., Inc.



Publishers of  
Scriptographic® Booklets

CORPORATE HEADQUARTERS  
200 State Road  
South Deerfield, MA 01373, USA  
Telephone: 413-665-7611  
Facsimile: 413-665-3355

93-292

RECEIVED BY

MAR 1 1994

February 17, 1994

FOOT MAIL ROOM

Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

Commissioners:

In response to the FCC request for comments on the proposed rulemaking (CC Docket No. 93-292), I offer the following response regarding toll fraud.

To begin, as a member of the New England SL-1 Users Association chapter of the International SL-1 Users Association, I support in full the ISLUA stand and written response to the toll fraud issue. The letter written by Gary Jensen, Chairman of the International SL-1 Users Association, Unauthorized Access Committee spoke to the essence of the matter with the need for shared responsibility, and stronger laws pertaining to toll fraud.

It's incomprehensible to expect Customer Premise Equipment (CPE) owners to be held solely responsible for toll fraud when so many other professional organizations are involved. These organizations, the Long Distance Carriers, the Local Exchange Carriers (LECs), and Equipment Manufacturers who have the knowledge and resources available for monitoring, detection, and in a high percentage of cases prevention of toll fraud must share the burden.

Tightening the laws pertaining to toll fraud; providing the necessary tools, and empowering the local and state law enforcement agencies to apprehend these criminals are essential. Unfortunately, without significantly improving our conviction record, and without providing more than a slap on the wrist for those few who are convicted, we will not be deterring toll fraud activity.

The level of hacker sophistication, the capabilities incorporated into the premise equipment, the absence of strong regulations, and weak penalties concerning unauthorized access have created a gold mine just waiting to be tapped.

No. of Copies rec'd  
List ABCDE

*Orig.*

Federal Communications Commission  
February 17, 1994  
Page 2

RECEIVED BY

MAR 1 1994

FCC - WASHINGTON

I feel it should be stressed that as CPE owners we are willing to accept responsibility for protecting our premise equipment. We should not be expected to shoulder the full burden of responsibility as we are only one link in the total communication chain.

Sincerely,



**Kenneth A. Robidoux**  
Manager, Telecommunications

KAR/sjp

cc: The Honorable Edward M. Kennedy  
The Honorable John F. Kerry  
The Honorable John W. Olver  
The Honorable Edward J. Markey

---

**Channing L. Bete Co., Inc.**

