

October 3, 2014

By Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Videlica's Letter of Support for Petition for Expedited Declaratory Ruling  
of VoAPPs, Inc.; FCC Docket No. 02-278

Dear Ms. Dortch:

Videlica strongly supports the Petition for Expedited Declaratory Ruling (the "Petition") filed by VoAPPs, Inc. ("VoAPPs"), requesting that the Federal Communications Commission (the "FCC") issue a declaratory ruling that the delivery of a voice message directly to a voicemail box through the use of VoAPPs' DirectDROP Voicemail technology does not constitute a call that is subject to the prohibitions on the use of an automatic telephone dialing system or an artificial or prerecorded voice that are set forth in the Telephone Consumer Protection Act.

The landscape has changed since the 1991 passage of the TCPA. Today, some 40% of households are wireless only, having no landline telephone service. The number of wireless-only households continues to grow year over year. However, what often goes unnoted is that there is a disproportionate number of wireless telephone numbers provided by consumers on credit and loan applications, medical admission forms, etc.

This is evidenced by the fact that in the collections arena, 60% or more of the contact phone numbers provided by consumers are wireless numbers. Clearly, the majority of consumers when asked for a telephone contact number willingly declare their preference to be reached on their wireless device by providing their wireless contact number. Yet call centers that attempt to communicate with consumers on the wireless device face outdated rules and a legal environment that make such communications treacherous.

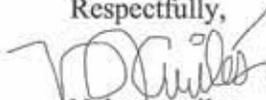
In an increasingly wireless society, businesses who operate call centers have no option other than to contact consumers using their wireless phone number. In non-telemarketing situations, both the business and the consumer wish to conduct legitimate and necessary business activities over the wireless phone. Yet, even when using the

wireless telephone number that was provided by the consumer as their preferred contact number, businesses today face an ever increasing risk of litigation. Large, medium and small businesses alike are facing lawsuit after lawsuit even for legitimate, non-telemarketing business operations. This was not foreseen nor intended by the sponsors of the TCPA back in 1991.

In response to this migration to wireless, a new technology, VoAPPs' DirectDROP Voicemail has emerged in the call center space. DirectDROP offers the prospect of resolving the wireless contact dilemma in a way that proves beneficial to all parties. If consumers wish to provide their wireless number to a business, then that business call center can now utilize, a new and cost effective DirectDROP Voicemail technology to contact the consumer on the wireless device. The contact is a non-intrusive voicemail that is dropped directly into the consumer's wireless voice mailbox without interrupting them by first calling their wireless phone. The broad penetration and familiarity of voicemail allows consumers the convenience that they first sought when providing their wireless number to the business. Furthermore, there is no cost to the consumer since voicemail is a free service offered by nearly all US wireless carriers.

For the aforementioned reasons, we urge the FCC to grant the VoAPPs 'Petition.

Respectfully,



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Videlica helps businesses improve their customer's experience at the contact point of the business. We create links between consumers and businesses by improving contact center tools, processes and innovation in the United States and abroad.