

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of the)
)
Rules and Regulations Implementing)
) **CG Docket No. 02-278**
the Telephone Consumer Protection)
)
Act of 1991)

**Joe Shields Opposition to the Ex Parte Presentation of Call-Em-All, LLC and
Request For Full Disclosure**

Call-Em-All, LLC filed an Ex Parte Memorandum with the Commission on June 5th, 2015. The Notice fails to meet the minimum standards set forth by Commission rules:

(b) The following disclosure requirements apply to *ex parte* presentations in permit but disclose proceedings:

(1) *Oral presentations.* A person who makes an oral *ex parte* presentation subject to this section shall submit to the Commission's Secretary a memorandum that lists all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and **summarizes all data presented and arguments made** during the oral *ex parte* presentation. Memoranda must contain a summary of the substance of the *ex parte* presentation and not merely a listing of the subjects discussed. **More than a one or two sentence description of the views and arguments presented is generally required.**

See 47 C.F.R. §1.1206(b)(1) The Ex Parte Memorandum of Call-Em-All, LLC fails to provide a proper summary of the substance of the Ex Parte presentation.

A reading of the Ex Parte Memorandum does not set forth what was discussed with Nicholas Degani and Ben Sunshine of the Office of Commissioner Pai. Only a terse one sentence on the application of the Telephone Consumer Protection Act to robocall blasters was provided. Call-Em-All, LLC's position on how the Telephone Consumer Protection Act applies to robocall blasters was not provided.

Given that the oral ex parte presentation was made on behalf of a previously cited entity it is imperative that full disclosure is made in the proceeding. See In The Matter of Call-Em-All LLC, DA 15-527 Citation and Order Prerecorded Message Violations, Released May 4th 2015.

The representatives of Call-Em-All LLC when meeting with members of the Commission should not be allowed to fail to summarize what was presented during the discussion. I am certain that other Commission members and members of the public are interested in the efforts of a cited robocall blaster to neuter the protections of the TCPA. Members of the Commission and the public deserve a fair and full disclosure of any Ex Parte meetings with the Commission members.

I respectfully request that Call-Em-All, LLC be directed by the Commission to file a proper Ex Parte Memorandum to insure fairness and full disclosure of the issues presented during the discussion with Commission members.

Respectfully submitted,

_____/s/_____

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cc: Marlene H. Dortch