



1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

CHENG-YI LIU
(703) 812-0478
liu@fhhlaw.com

July 20, 2015

Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Dkt. No. 94-129; Certification of Exemption from “Drop-Off” Requirement

Dear Ms. Dortch:

Long Distance Consolidated Billing Co. (“LDCB”), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the “drop-off” requirement set forth in Section 64.1120(c)(3)(ii) of the Federal Communications Commission’s (“Commission’s” or “FCC’s”) rules.¹ The Commission established a mechanism in CC Dkt. No. 94-129 by which carriers certifying as to their inability to comply with the “drop-off” rule will be exempt from that rule for a two-year period.²

LDCB previously submitted a certification of exemption from the Commission’s “drop-off” requirement on June 28, 2013.³ In its *Third Order on Reconsideration*, the Commission stated that carriers that wished to extend their exemption must re-certify at the end of the two-year period (and every two years thereafter) as to their continuing inability to comply with the “drop-off” requirement.⁴ LDCB is re-certifying to its continuing inability to comply with the “drop-off” requirement for the two-year period starting June 29, 2015.

¹ 47 C.F.R. § 64.1120(c)(3)(ii).

² See *Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers’ Long Distance Carriers*, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 18 FCC Rcd 5099 (rel. March 17, 2003) (“*Third Order on Reconsideration*”).

³ Under the *Third Order on Reconsideration*, LDCB’s exemption from the “drop-off” rule was valid for two years from the date on which LDCB’s previous certification was submitted.

⁴ See *Third Order on Reconsideration* at para. 35.

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The type of technology used by LDCB's telemarketing providers does not allow the person initiating a three-way call to "drop-off" the line without also disconnecting the three-way call. Upgrading to a system which would allow LDCB's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for LDCB's telemarketing providers given their small size. Thus, the telemarketing providers are unable to comply with the "drop-off" requirement. This precludes LDCB from complying with the "drop-off" rule. Enclosed is a declaration, pursuant to Section 1.16 of the FCC's rules,⁵ by Jan Lowe, President of LDCB, in support of these statements.

Questions regarding this submission should be addressed to the undersigned.

Respectfully submitted,

/s/ Cheng-yi Liu

Counsel for Long Distance
Consolidated Billing Co.

Enclosure

⁵ 47 C.F.R. § 1.16.

DECLARATION

I, Jan M. Lowe, certify that I am President of Long Distance Consolidated Billing Co. ("LDCB") and that I am authorized to make this certification for LDCB. I certify that LDCB is unable to comply with the "drop-off" requirement as set forth in 47 C.F.R. § 64.1120. Specifically, the technology used by LDCB's telemarketing providers does not allow the person initiating a three-way call to "drop-off" the line without also disconnecting the three-way call. Upgrading to a system that would allow LDCB's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for LDCB's telemarketing providers given their small size. Thus, the telemarketing providers, and LDCB, are unable to comply with the "drop-off" requirement. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct.

Executed on July 16, 2015



Jan M. Lowe, President
Long Distance Consolidated Billing Co.