

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
Twilio Inc. Petition ) WC Docket No. 08-7

**COMMENTS OF  
VOXIVA INC.**  
Justin Sims  
Paul Meyer  
1990 K St NW  
Washington DC, 20006

November 19, 2015

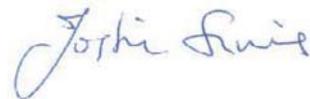


While the TCPA also provides consumer protection, enforcement can be problematic in the domain of text messaging. Text messaging can be cheap and therefore tens of thousands of messages can be sent for a few dollars. It can also be easy to set up. For example, at the most basic level, a pre-paid SIM card could be placed inside a GSM model and attached to a computer running a software algorithm that sends messages. In this example, enforcement action would be difficult as would be the case if messages were transmitted from abroad, via the internet, to a long or short code in the USA.

The organizations that wish to by-pass the TCPA rules and/ or industry guidelines are most likely to be those that are involved in scams or fraudulent activities which would also undermine the trust that consumers have in this communications medium.

In summary, Voxiva recommends that text messaging should remain free from regulatory mandates that would limit the ability of wireless companies to take action when messages are detected that would harm consumers and the vibrant messaging ecosystem.

Respectfully submitted,

A handwritten signature in blue ink that reads "Justin Sims". The signature is written in a cursive, flowing style.

Justin Sims  
President and Co-CEO  
Voxiva Inc.

November 19, 2015