



NOBCO

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December 17, 2015

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Twilio Petition: WT Docket No. 08-7

Dear Chairman Wheeler,

The members of the National Association of Black County Officials see economic development as one of our top priorities along with protecting our citizens from the abuses that at times accompany commercial activity. These two concerns are especially poignant in our communications markets. Today's communications market provides consumers with different ways of communicating that were unimaginable to most consumers 25 years ago. Smartphone use is not limited to voice calling. Smartphones provide access to the Internet and to e-mail. They also allow us to use text messaging which has become very popular. Text messaging provides the consumer with a level of convenience and trust that typical voice calling does not.

Wireless carriers ensure that consumers enjoy the convenience and relative trust of texting by filtering messages for unwanted spam, malicious messaging, and other fraudulent activity. Also where wireless subscribers do not want to be inconvenienced by unwanted campaign messaging, wireless providers ensure that opt-out provisions for subscribers are adhered to.

From a public policy standpoint, the use of filtering technology and opt-in policies make sense. Filtering helps maintain the level of trust subscribers have in the texting experience and helps wireless carriers maintain their subscriber base. This sound policy is being threatened by a petition filed with the Federal Communications Commission by a text messaging platform firm called Twilio. Twilio is requesting that the Commission prohibit wireless carriers from blocking texts, a request that if granted would take away a wireless carrier's ability to filter spam and fraudulent messaging. Such a request makes our task of providing for our communities' well-being all the more difficult.

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The text messaging market has been flourishing without the additional regulations that Twilio wants. Wireless carriers are making a major contribution by filtering out fraudulent or unwanted text messages. The Federal Communications Commission should take the opportunity to declare industry practice as sound public policy and deny Twilio's petition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Helen L. Holton", with a stylized flourish at the end.

Helen L. Holton
Executive Director