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November 14, 2000

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte
CC Docket No. 94-129

Dear Ms. Salas:

On Sunday, November 13, 2000, while attending the NARUC Annual Meeting in San Diego, California, I had an *ex parte* meeting with Dorothy Attwood, the FCC's Common Carrier Bureau Chief, in which I discussed the voluntary participatory nature of the "IXC-LEC Slamming Best Practices Working Group".

Specifically, I expressed concern that this informal Working Group's Slamming Liability compliance approach should be viewed in the same manner as the Industry Cramming Best Practices. The Industry Cramming Best Practices are considered voluntary, not binding on the affected carriers. It is therefore important to recognize that not all carriers have opted to adopt the Industry Cramming Best Practices as the sole approach to regulatory compliance and that enforcement efforts must account for this status. Thus, to the extent that the FCC decides to impose the Slamming Best Practices approach on a mandatory basis on all carriers for compliance purposes, I urged that the FCC consider issuing a further notice of proposed rulemaking in order to allow the entire industry and the public the opportunity to have input, and to ensure that any enforcement of these federal Slamming rules which imposes the Working Group's compliance approach on all carriers is consistent with requisite law.

In accordance with the Commission's Rule 1.1206(b)(1), enclosed please find two copies of this *ex parte* filing for inclusion in the record of this proceeding. Due to the fact that I was traveling and unable to make the filing on November 13th, this filing is being made on November 14th.

Please contact the undersigned if you have questions concerning this filing.

Very truly yours,

Julie E. Rones

Julie E. Rones
Senior Legal Counsel
USTA Legal and Regulatory Affairs

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cc: Dorothy Attwood, FCC Common Carrier Bureau Chief
Bradford Ramsey, General Counsel, NARUC