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February 15, 2006

Ex Parte

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

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

Dear Ms. Dortch:

On February 13, 2006 Amy Rosenthal and the undersigned, representing Verizon, met with Jay Keithley and Lisa Boehley of the Consumer and Governmental Affairs Bureau to discuss Verizon's support of petitions seeking declaratory rulings that the federal government has exclusive regulatory jurisdiction over interstate telemarketing and that inconsistent state laws purporting to regulate interstate telemarketing are preempted. Verizon detailed the legal basis for its support of these positions, consistent with its filed comments in the above-captioned docket. Verizon also pointed out additional compliance burdens associated with the current patchwork of different state laws regarding interstate telemarketing, in that with the growth of VoIP, telephone numbers increasingly do not reflect the physical location of the called party. Telemarketers may not be able to determine into which state they are calling, and therefore may face additional hurdles in attempting to comply with inconsistent state laws.

If you have any questions, you can contact me at 202 515-2545.

Sincerely,

A handwritten signature in black ink, appearing to be "Tyrone Keys, Jr." with a stylized flourish at the end.