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Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

Re: Ex Parte – In the Matter of Implementation of the Telecommunications Act of 1996 - Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115; Petition for Rulemaking to Enhance Security and Authentication Standards for Access to Customer Proprietary Network Information, RM-11277

Dear Ms. Dortch:

On October 24, 2006, Celia Nogales – Executive Director, Davida Grant – Senior Counsel and the undersigned met with Bruce Liang Gottlieb, Legal Advisor for Commissioner Copps to discuss the above referenced proceeding. At the meeting AT&T discussed the following: (a) the limited use of social security number as an authentication tool, (b) optional password protection for customers; (c) customer notification once the carrier has investigated and determined fraudulent activity; and (d) its safe harbor proposal. AT&T urged the Commission to consider adoption of safe harbor guidelines, which would serve as a *de facto* industry standard, while allowing a carrier the necessary flexibility to implement those measures more appropriate and effective to safeguard its customers' proprietary network information.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif

Anisa A. Latif, Associate Director

Attachment

cc: Bruce Liang Gottlieb