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VIA HAND AND ELECTRONIC DELIVERY

October 30, 2006

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

**Re: Notice of Ex Parte Presentation, CC Docket No. 96-115  
Telecommunications Carriers' Use of Customer Proprietary  
Network Information and Other Customer Information**

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Dear Ms. Dortch:

On October 27, 2006, the Anti-Pretexting Working Group ("Group") met with Ian Dillner of Commissioner Tate's Office. We discussed the Group's<sup>1</sup> efforts to develop industry best practices to prevent pretexting of customer call detail records, the Group's request that the Commission consider industry best practices as a safe harbor for complying with new security rules, and the Group's concerns regarding customer passcodes as a mandatory, one-size-fits-all authentication method.

The Anti-Pretexting Working Group includes a broad spectrum of ILECs, Wireless Carriers, Cable Operators and a major CLEC ("service providers"). We explained the Group's work developing the best practices, the Group's plans to continue its work on an on-going basis to share information about pretexter tactics and to adjust best practices to meet the evolving challenges posed by pretexting and changes in technology. We explained that the Group is developing best practices that are open to any service provider and that the Group welcomes the participation of other companies in its efforts. We also expressed the Group's belief that best practices and any regulations in this area need to avoid providing a roadmap for pretexters of security measures that companies use, and the group's hope that the Commission will recognize a safe harbor for service providers that follow the Group's best practices.

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<sup>1</sup> The Anti-Pretexting Working Group was represented by Jim Halpert, DLA Piper US LLP, counsel to the Working Group. Among the participating companies, the following companies were present at the meeting: Anisa Latif and Celia Nogales, AT&T; Megan Delaney, Charter Communications; Heidi Salow, Sprint Nextel Corporation; Lynn Starr and Melissa Newman, Qwest Communications, Inc.; Donna Epps and Karen Zacharia, Verizon; and Lisa Youngers, XO Communications.



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Finally, the Group described industry concerns regarding proposals to mandate that customers supply passcodes in order to access account information. We explained that mandatory passcodes are problematic because they would eliminate consumer choice, run counter to the wishes of most consumers, and create delay and consumer frustration.

Consistent with the Commission's ex parte rules, please associate this letter, which is being filed electronically, with the above-captioned docket. Please contact me if you have any questions related to this filing.

Sincerely,

A handwritten signature in black ink that reads 'Jim Halpert'.

Jim Halpert  
Counsel to the Anti-Pretexting Working Group

cc: Ian Dillner, FCC