

LAW OFFICES OF THOMAS K. CROWE, P.C.

1250 24th STREET, N.W.
SUITE 300
WASHINGTON, D.C. 20037

TELEPHONE (202) 263-3640
FAX (202) 263-3641
E-MAIL firm@tkcrowe.com

JOSHUA T. GUYAN, ASSOCIATE
DIRECT DIAL: 202-263-3642
EMAIL: firm@tkcrowe.com

November 29, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: CC Dkt. No. 94-129; Certification of Exemption from "Drop-Off" Requirement

Dear Ms. Dortch:

Communications Network Billing Inc. ("CNBI"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C.F.R. Section 64.1120.

In its decision in CC Dkt. No. 94-129, the Commission established a mechanism by which carriers certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two-year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 68 Fed. Reg. 19152 & 19176 (rel. March 17, 2003).

The conference call capability of the dialing systems used by CNBI's telemarketers only allows for three-way "supervised" outside premise calls. Thus, if CNBI's telemarketers were to "drop off" a three-way call, the "supervision" would be lost and the call would be disconnected. This precludes CNBI from complying with the "drop-off" rule. Upgrading to a system which would allow CNBI's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for a company of CNBI's size. A certification signed by Cristina Tucker, President of CNBI, made in support of these statements under Section 1.16 of the Commission's rules is enclosed herewith.

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Questions regarding this certification should be addressed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua T. Guyan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joshua T. Guyan,
Counsel for Communications Network
Billing Inc.

Enclosure

cc: David Marks, Federal Communications Commission

CERTIFICATION

I, Cristina Tucker, certify that I am President of Communications Network Billing Inc. ("CNBI") and that I am authorized to make this certification for CNBI. Further, I certify that CNBI is unable to comply with the "drop off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, the conference call capability of the dialing systems used by CNBI's telemarketers only allows for three-way "supervised" outside premise calls. Thus, if CNBI's telemarketers were to "drop off" a three-way call, the "supervision" would be lost and the call would be disconnected. This precludes CNBI from complying with the "drop-off" rule. Upgrading to a system which would allow CNBI's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for a company of CNBI's size. This precludes CNBI from complying with the "drop-off" rule. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct. Executed on

NOV 22 2006



Cristina Tucker
President,
Communications Network Billing Inc.