



Sprint Nextel
2001 Edmund Halley Drive
Reston, Virginia 20191

Kent Y. Nakamura
Vice President and Chief Privacy Officer

December 13, 2006

Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
CC Docket No. 96-115; RM 11277

Dear Ms. Dortch:

This letter is to inform you that on December 12, 2006, Kent Nakamura and Frank Triveri of Sprint Nextel Corporation (“Sprint Nextel”) met with Julie Veach of the Wireline Competition Bureau to discuss the Commission’s *Notice of Proposed Rulemaking* in the above-referenced proceeding.

Sprint Nextel elaborated on two of the seven ways in which it plans to authenticate its customers: through (1) shared-secret questions and answers (e.g., “what was the name of your first pet?”), and (2) “dedicated service lanes,” where customers interact with assigned account representatives through assigned telephone numbers, which are not known to the public or pretexters.

As part of Sprint Nextel’s planned billing-system authentication upgrades, Sprint Nextel plans to authenticate customers with (1) passcodes, (2) personal identification numbers, (3) government-issued photographic identification, (4) service- or invoice-specific questions that only the accountholder could reasonably be expected to know, (5) calls that Sprint can validate as originating from a Sprint Nextel device of record, (6) dedicated services lanes, and (7) shared-secret questions and answers.

Sprint Nextel explained that the Commission should provide flexibility in any rule governing shared-secrets, to allow both carrier- and customer-specified shared-secret questions. Thus, carriers should have the option of not only allowing customers to specify both their shared-secret question; carriers should also have the option of specifying questions (e.g., a changing menu of ten questions) from which customers select an answer, provided that carrier-specified questions would be at least as secure as customer-specified questions.

Sprint Nextel further explained that the Commission should provide flexibility in any rule governing how carriers may authenticate customers. So long as the means of authentication are secure, carriers should be allowed to authenticate according to customer need. This means, for example, that corporate customers who have dedicated service lanes—assigned customer account representatives, with contact information that is not available to the public—should be excluded from any mandatory-password requirement. Dedicated service lanes are not available to pretexters, who apply social engineering techniques through publicly available channels, such as carriers' general customer service channels.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please associate this letter with the file in the above-referenced proceedings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kent Y. Nakamura", with a long horizontal flourish extending to the right.

Kent Y. Nakamura
Vice President and Chief Privacy Officer

cc: Julie Veach, Esq.