Anisa A. Latif
Associate Director
Federal Regulatory

AT&T Services. Inc.
1120 20th Street, N.W.,
Suite 1000
Washington, D.C. 20036

202.457.3068 Phone
202.457.3071 Fax
al7161@att.com E-mail

January 11, 2007

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 January 11, 2007, Robert Quinn – Senior Vice President, Federal Regulatory, Brian Fontes – Vice President, Federal Relations, Celia Nogales – Executive Director, Federal Regulatory and Davida Grant – Senior Counsel met with Barry Ohlson and Scott Bergmann, Legal Advisors for Commissioner Adelstein to discuss the above referenced proceeding. At that meeting AT&T discussed (a) its security measures to protect customer private call detail records, (b) the Opt-out regime and its non relation to the prevention of pretexting; (c) customer notification once the carrier has investigated and determined fraudulent activity; (d) applicability of any new regulations to interconnected VoIP providers; and (e) allowing carriers at least one year to implement any new regulations.

AT&T urged the Commission to narrow any new regulations to address pretexting. AT&T also urged the Commission not to institute an Opt-in regime for the sharing of CPNI with joint venture partners and independent contractors. Because a customer's opt-in or opt-out CPNI status has no bearing on whether a pretexter can access CPNI, an opt-in solution is neither directly material to the government's interest in protecting CPNI nor narrowly tailored to that goal.

Furthermore, AT&T urged the Commission to limit the instances in which carriers would be required to notify law enforcement of unauthorized access to call detail records. Specifically, AT&T proposes that carriers only be required to notify law enforcement of *material* fraudulent access to customer accounts. In determining "material fraudulent access" the carrier should consider whether there is a pattern or practice of unauthorized access (i.e. scope of the unauthorized access) by an individual or entity. Without limiting the notice requirement in this manner, carriers and law enforcement will likely be overwhelmed with activity that cannot reasonably lead to prosecution – thus simply delaying customer notice and other remedial efforts.

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

Sincerely,
/s/ Anisa A. Latif
Anisa A. Latif

cc: Barry Ohlson
Scott Bergmann

USA Proud Sponsor of the U.S. Olympic Team