



January 19, 2007

**SUMMARY OF  
EX PARTE PRESENTATION**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWA325  
Washington, DC 20554

**Re: Implementation of the Telecommunications Act of 1996: Telecommunication Carrier's 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:

Yesterday, James W. Olson and I of USTelecom and representatives of six USTelecom member companies met with Scott Bergmann, Commissioner Adelstein's Legal Advisor for Wireline Issues, to discuss issues relating to the Commission's proceeding on customer proprietary network information ("CPNI"). David Bartlett of Embarq joined us for the meeting in person, and Diane Roth of Embarq, Kevin Albaugh of North Pittsburgh Telephone Company, Trent Boaldin of Epic Touch, Robert Shannon of CenturyTel, Anisa Latif of AT&T, and Donna Epps of Verizon joined us by telephone.

The purpose of the meeting was to discuss the CPNI order currently on circulation at the Commission. USTelecom expressed concern over a consumer opt-in requirement, which would have a significant effect on many USTelecom members who use independent contractors and joint venture partners for marketing purposes. In addition, USTelecom recommended that the Commission limit the instances in which carriers must notify law enforcement of unauthorized access to call detail records to cases in which there has been material, verified fraudulent access to customer accounts. USTelecom also expressed its view that new rules protecting call detail information should apply equally to ILECs, CLECs, and VoIP providers. Finally, USTelecom suggested that one year would be a reasonable period of time for carriers to implement any new CPNI rules.

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Pursuant to Section 1.1206(b) of the Commission's rules, one copy of this electronic notice is being filed in the above-referenced docket. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Indra Sehdev Chalk", written in a cursive style.

Indra Sehdev Chalk  
Counsel

cc: Scott Bergmann