

SandraLyn Bailey

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96-115

From: Joshi, Meena [mjoshi@ustelecom.org]
Sent: Thursday, January 18, 2007 3:18 PM
To: fcc@bcpiweb.com
Cc: Robert McDowell; Angela Giancarlo; John Hunter; Melissa Slawson
Subject: CC Docket No. 96-115 - CPNI Advocacy
Attachments: 20070118_Ex Parte CPNI 96-115.pdf

FILED/ACCEPTED
FEB - 9 2007
 Federal Communications Commission
 Office of the Secretary

Attached for your information, is a copy of the Ex Parte in the above-referenced proceeding filed by USTelecom with FCC today, January 18, 2007.



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USTELECOM
UNITED STATES TELECOM ASSOCIATION

January 18, 2007

**SUMMARY OF
EX PARTE PRESENTATION**

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th 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:

On January 17, 2007, James W. Olson, Justin Faulb, and I of USTelecom and representatives of three USTelecom member companies participating by telephone—Anisa Latif of AT&T, Robert Shannon of CenturyTel and Kevin Albaugh of North Pittsburgh Telephone Company—spoke with Commissioner Robert M. McDowell and his legal advisors, John W. Hunter and Angela E. Giancarlo, and Melissa Slawson, intern, to discuss issues relating to the Commission's proceeding on customer proprietary network information ("CPNI").

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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Ms. Marlene Dortch
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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,



Indra Sehdev Chalk
Counsel

cc: Robert M. McDowell
John W. Hunter
Angela E. Giancarlo
Melissa Slawson