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May 3, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
Suite 110
236 Massachusetts Avenue, NE
Washington, D.C. 20002
Attn: Audio Division, Media Bureau

Re: CC Doc. No. 94-129, Certification of Exemption from “Drop-off” Requirement Set Forth in Section 64.1120(c)(3)(iii) of the Commission’s Rules

Dear Ms. Dortch:

Please find Network Service Billing, Inc.’s (“NSBI”) enclosed certification that it qualifies for an exemption from the “drop-off” requirement set forth in section 64.1120(c)(3)(iii) of the Commission’s rules, 47 C.F.R. § 64.1120(c)(3)(iii).

In *Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers’ Long Distance Carriers*, 18 FCC Rcd 5099, Third Order on Reconsideration (2003) (“*Third Order on Reconsideration*”), the Commission provides for an exemption of the “drop-off” rule in section 64.1120(c)(3)(iii) stating “we will exempt from the rule those carriers that certify to the Commission that their sales gents are unable to drop off the sales call after initiating a third party verification.” *Third Order on Reconsideration* at 5113, ¶ 35.

As explained in the enclosed certification by Peter Lagergren, President of NSBI, the telemarketing companies used by NSBI lack the technical capability to comply with the FCC’s “drop off” rule. The technology used by NSBI’s telemarketing providers do not allow the telemarketer initiating a three-way call to “drop off” the line without also disconnecting the three-way call. Upgrading to a system that would allow NSBI’s telemarketers to “drop-off” once a three-way call is initiated would be cost-prohibitive for a company of NSBI’s size.

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Questions regarding this certification should be addressed to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Gregory D. Kwan". The signature is written in a cursive style with a large initial "G" and a long horizontal flourish at the end.

Gregory D. Kwan

*Counsel for Network Service Billing,
Inc.*

Enclosure

CERTIFICATION

I, Peter Lagergren, President of Network Service Billing, Inc. ("NSBI"), certify that NSBI is unable to comply with the "drop off" requirement as set forth in section 64.1120(c)(3)(ii), 47 C.F.R. § 64.1120(c)(3)(iii). The technology used by NSBI's telemarketing providers do not allow the telemarketer initiating a three-way call to "drop off" the line without also disconnecting the three-way call. Upgrading to a system that would allow NSBI's telemarketers to "drop-off" once a three-way call is initiated would be cost prohibitive for a company of NSBI's size. This precludes BNLD from complying with the "drop-off" rule. I hereby certify that to I am authorized to certify the foregoing statements on behalf of NSBI, and to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct.

Executed on APR 30 2007 .



Peter Lagergren
President,
Network Service Billing, Inc