

February 13, 2008

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

**Re: CC Docket No. 96-115; WC Docket No. 04-36. CPNI Requirements**

Dear Ms. Dortch:

On Tuesday, February 12, 2008, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA - The Wireless Association® (“CTIA”), and John Scott, Vice President and Deputy General Counsel of Verizon Wireless, met with Julie Veach, Amy Bender, and William Dever of the Wireline Competition Bureau to discuss the above-captioned proceeding. CTIA discussed its pending Petition for Reconsideration of the Commission’s rules regarding customer proprietary network information (“CPNI”).<sup>1</sup>

CTIA explained the need for the Commission to redress a number of administrative issues raised in its Petition for Reconsideration. CTIA asked the Commission to modify its definition of “address of record.” The current definition restricts the ability of carriers to contact new customers during the first 30 days of their business relationship because it specifies only addresses that have been on record for more than 30 days. In addition, CTIA asked for clarification of the Commission’s certification requirements, as there is ambiguity as to whether carriers must file two separate certifications for 2007 for the periods of two separate CPNI rule regimes. Finally, CTIA asked the Commission to clarify that the new CPNI rules pertaining to release of information are applicable only to *customer-initiated* calls.

Pursuant to 47 C.F.R. § 1.1206, this letter is being electronically filed with your office. Please do not hesitate to contact the undersigned with any questions concerning this submission.

Sincerely,

*/s/ Christopher Guttman-McCabe*

Christopher Guttman-McCabe

cc: Julie Veach  
Amy Bender  
William Dever

<sup>1</sup> See Petition for Reconsideration of CTIA - The Wireless Association®, CC Docket No. 96-115, WC Docket No. 04-36 (filed July 9, 2007).

