

NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

DOCKET FILE COPY ORIGINAL

Attorneys at Law

Leon L. Nowalsky
Benjamin W. Bronston
Edward P. Gothard

3500 North Causeway Boulevard
Suite 1442
Metairie, Louisiana 70002
Telephone: (504) 832-1984
Facsimile: (504) 831-0892

Monica Borne Haab
Philip R. Adams, Jr.

May 2, 2008

Via Federal Express

Marlene H. Dortch, Secretary
Federal Communications Commissions
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: CC Dkt. No.: 94-129; Certification of Exemption from "Drop-Off" Requirement

Dear Ms. Dortch:

Reduced Rate Long Distance, LLC ("RRLD"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C.F.R. Section 64.1120.

In its decision in CC Dkt. 94-129, the Commission established a mechanism by which carriers' certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two-year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 68 Fed. Reg. 19152 & 19176 (rel. March 17, 2003).

Due to technical limitations to the type of service available to RRLD's marketing companies through their local exchange carriers, RRLD's marketing representatives are unable to "drop-off" a call after a three way conference call is initiated. This precludes RRLD from complying with the "drop-off" rule. A certification signed by Robert Sorrentino, President of RRLD, is made in support of these statements under Section 1.16 of the Commission's rules is enclosed herewith.

No. of Copies rec'd 0
List ABCDE

Marlene H. Dortch

May 2, 2008

Page -2-_____

An additional copy of this letter has been enclosed to be date-stamped and returned in the envelope provided as evidence of the filing.

Questions regarding this certification should be addressed to the undersigned.

Very truly yours,



Leon L. Nowalsky *lln*

Counsel for Reduced Rate Long Distance, LLC

LLN/saw

Enclosure

cc: David Marks, Federal Communications Commission
Qualex International

CERTIFICATION

I, Robert Sorrentino, certify that I am President of Reduced Rate Long Distance, LLC ("RRLD"); that I am authorized to make this certification for Reduced Rate Long Distance, LLC. I certify that RRLD is unable to comply with the "drop-off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, due to technical limitations to the type of service available to RRLD's marketing companies through their local exchange carriers, RRLD's marketing representatives are unable to "drop-off" a call after a three-way conference call is initiated. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct. Executed on APRIL 25, 2008.

Robert Sorrentino

Robert Sorrentino
President, Reduced Rate Long Distance, LLC