



October 22, 2009

***Via Electronic Delivery***

Sharon Gillett  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: Written *Ex Parte* Presentation - WC Dkt. 07-135, *In the Matter of Establishing Just and Reasonable Rates for Local Exchange Carriers*

Dear Ms. Gillett:

Global Conference Partners (“GCP”) writes to respond to the repeated smear tactics being used by AT&T and other interexchange carriers (“IXCs”) in this docket. Specifically, the IXCs have repeatedly lumped together “sex chat lines” with free conference calling services.<sup>1</sup> The repeated smear campaign here is as unacceptable as it is unhelpful to the resolution of issues this proceeding. Instead, the Commission

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<sup>1</sup> Letter of Robert Quinn, AT&T, to Sharon Gillett, FCC, WC Dkt. No.s 07-135 and 07-52 (Oct. 14, 2009); Letter of Michael B. Fingerhut, Sprint Nextel, to Marlene Dortch, FCC, WC Dkt. No. 07-135 (Apr. 29, 2009) (describing that free conference calling service “enable minors to easily access explicit pornographic chat”); Letter of Melissa E. Newman, Qwest, to Marlene Dortch, FCC, WC Dkt. No. 07-135 (Sept. 25, 2009) (stating the IUB found that several free conference calling services “provided obscene or pornographic material”); Reply Comments of AT&T, WC Dkt. No. 07-135, at 12 (Jan. 16, 2008) (“many of these services make pornographic chat-lines available free to minors with a simple long-distance phone call”); Comments of AT&T, WC Dkt. No. 07-135 (Dec. 17, 2007) (“one of the most prolific methods of artificial traffic stimulation are “chat lines” – many of which offer “adult” or sexual subject matter”); *id.* at Attachment, Affid. of A. Panagia at 5 (“One of the most prevalent traffic pumping techniques is to provide ‘free’ or low cost chat lines, often providing sexually explicit content.”).



should promptly resolve this proceeding *on the facts* of the services and businesses being impacted.

The facts are that GCP and other conference service providers offer American consumers an accessible and innovative alternative to the IXCs' bundled and overly expensive conference service offerings. Further, GCP and other conference services offer features that simplify the process of conference set-up (including fully web-based set-up and reminder features) and that enhance the utility of conference services (including desktop sharing capabilities) and have improved users ability to communicate by maximizing productivity and increasing efficiency. As a result, a host of leading public and private U.S. institutions regularly rely on GCP's services, including: members of both houses of the U.S. Congress, the Federal Aviation Administration, US State Department, US Dept. of Justice, US Dept. of Homeland Security, US Treasury, NASA, US Dept. of Agriculture, US Environmental Protection Agency, and the United States Postal Service. General Electric and at least 75 of the Fortune 100 companies use GCP's services, as do non-profit and charity organizations including the American Red Cross, PBS, Make-a-Wish Foundation, The Nature Conservancy, Teach for America, AARP, and many others. Many educational institutions use GCP services, including UCLA, Harvard University, Yale University, Princeton, Brown, Columbia, Dartmouth and Cornell.

In defense of its subscribers, GCP must point out that the IXCs have absolutely no evidence supporting the suggestions that the individuals of these institutions or any other GCP users are somehow engaging in sex chat. To the contrary, as a small business offering competitive conference services in the United States for the past decade, GCP can attest that its services allow hundreds of thousands of subscribers to be more productive members of society, to communicate with other groups on a range of business, government and social matters, and in order to save money and to use their pre-paid long-distance services more effectively. Further, more effective usage of conferencing services means that people must travel less and, as a result, yields both environmental and global competitive gains for our country.

The repeated insinuation that the users of conference services engage idle and degenerate chatter is a gross mischaracterization. In fact, GCP knows that its users communicate vital information that strengthens our society as a whole. Indeed, many users have provided feedback to GCP that confirms the valuable impact of its services:

- “We are a small, grass roots, non-profit organization that is raising money to help educate girls in Africa. Educating girls is one of the most cost effective ways of alleviating poverty. Our donated dollars are very precious, and we



love using FreeConference for our Board of Directors conference calls. This way, donors know that their money goes directly to the girls in Africa.”

- “Your web based conference service works very very well for us. As a non-profit organization your service helps us to improve communication and management in the most cost efficient way one can hope for.”
- “Thank you for this conference setup. We had our first Board conference call in February. We are a national arts non-profit board with a small yearly budget. Our members live from Massachusettes to California. We only get together twice a year. This has enabled us to keep in touch and continue to get our work done. We have committed to a monthly phone conference. As incoming president, I can already see that the calls will make a big difference in our effectiveness as a board and our communications with each other. Thank you for providing this opportunity.”
- “We are a non-profit and money is not easy to come by so I must say, you are a God send. Not also is it free but your web site is absolutely professional and great looking, even with great tutorials! Thank you so much for this service. We really do appreciate it.”
- From a charitable organization dedicated to improving the lives of children, adults and families living with a severe health condition: “I just wanted to thank you all for offering this service. I am the founder and president of a new international non-profit organization. . . . We have been using your services (the free version) for over a year now for a monthly teleconference for our Board of Directors. We are, indeed, international, so calls are coming in from the U.S., Canada, Ireland, and even Australia. For a "start-up" organization such as our own (we are all volunteers, nobody is paid, and we're just now starting to fundraise), your service has been an absolutely invaluable tool.”
- From an innovative company that organizes professionals at for-profit companies to use their skills in the non-profit world: “We have been helping a lovely Sunnyvale company that provides services to those in need, such as youth exiting foster care, students in public schools attempting to improve their academic performance, persons attempting to recover from drug abuse, victims of spousal abuse, and the deaf and hard-of-hearing. The non-profit performs a wonderful service for the community, and I and five other professionals have been happy to help them improve their web-presence by working on a website project for them. However, we all have day jobs scattered throughout the Bay Area. We cannot meet face-to-face and we are



volunteers - we do not have a budget for conferencing. How fortunate it was for us, then to be able to use FreeConference.com: which allowed us to form phone conferences by simply dialing in.”

- “Just want to say that our non-profit organization has started using your site for some of our meetings and we love it. Especially since gas prices is going through the roof. It is cheaper to use the phone then to drive to a meeting.”
- "I just wanted to take a minute to thank you for the free conference call service. I am the president of an all volunteer, non-profit animal rescue organization. I signed up for your service and was able to use it this evening for a Board meeting. It was very helpful for my Board because we all live quite a distance apart.”

GCP believes it would disserve the American public for the Commission to be taken in by IXCs’ callous misrepresentations and, as a result, enact regulatory changes that would undermine the ability of competitive conference companies to offer low-cost and innovative services. Beyond the slander, to the extent that the IXCs’ substantive complaint is that some LEC terminating access rates are exorbitant, GCP has offered in its October 9<sup>th</sup> *ex parte* presentation a reasonable compromise that would cap the CLEC terminating access charge rates at no more than 2 cents-per-minute for high-volume CLEC customers such as conference services. We urge all parties in this proceeding to consider our compromise solution or other acceptable compromise solutions, in order that they may better focus their attention on serving the public and on innovating and investing in communications services.



global Ex Parte (WC Dkt. 07-135)  
conference October 22, 2009  
partners Page 5

Pursuant to the Commission's rules, one copy of this notice is being filed electronically in the above-referenced docket for inclusion in the public record. Please contact me directly should you have any questions.

Sincerely,

Ken Ford  
CEO  
Global Conference Partners

cc: Chairman Julius Genachowski  
Commissioner Michael Copps  
Commissioner Robert McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Atwell Baker  
Priya Aiyer  
Jennifer Schneider  
Christine Kurth  
Carol Simpson  
Christi Shewman  
Albert Lewis  
John Hunter  
Alexander Minard  
Jennifer Prime  
Lynne Engledow