



## BETTER BENEFITS ORGANIZATION, INC.

*"Connecting Business to Business"*

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Dear Chairman Genachowski:

I write to you as the President of Better Benefits Organization (BBO), an organization committed to providing businesses with necessary tools to generate new profit and reduce monthly expenses, including services such as search engine optimization and developing professional promotional materials. My company supports policymakers' efforts in the Notice of Proposed Rulemaking to protect customers from the deceptive practice of cramming. However, we believe that better consumer protections can be implemented without completely eliminating the privileges of third-party billing.

BBO is a US company that has more than 45 employees working to provide businesses with necessary tools to overcome challenges many small business professionals face. If you stop Third Party Billing, **all 45 employees will lose their jobs**. In these economic times, is this the message Washington wants to send to the business people? We understand that third-party billing is valued by small and large businesses because of the convenience and cost savings it provides. Because of these benefits, our sales have grown by tenfold since the advent of third-party billing.

Not only do we promise our customers cost-efficient services, we also hold ourselves to extremely high industry standards for customer satisfaction. We require that 99 percent of our third-party billing customers remain satisfied with the service they receive.

Third-party billing helps our loyal business customers reduce overhead administrative and billing costs, which helps them to keep the cost of their services low for their consumers. This service is particularly essential for start-up companies who need to control costs as they expand. Putting an end to this service would ultimately increase costs for both businesses and the customers they serve.

Instead of eliminating third-party billing entirely, we believe that industry standards should be developed to protect customers from phone bill cramming, such as requiring adherence to a standard for customer satisfaction and conducting 'due diligence' on all contracted vendors.

We encourage policymakers to explore measures that protect customers from deceptive business practices, while continuing to allow the benefits of cost-efficient and convenient billing services.

Sincerely,

Jeffery D. McKay  
President  
Better Benefits Organization

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