



Toni R. Acton
Director

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April 17, 2012

Via Electronic Submission

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CG Dockets 98-170, 09-158, and 11-116
Empowering Consumers to Prevent and Detect Billing for Unauthorized
Charges (“Cramming”)

Dear Ms. Dortch:

On Tuesday, April 17, 2012, Toni Acton, Myra Creeks and Davida Grant met with Kris Monteith, Mark Stone, Kurt Schroeder, Michael Jacobs, John Adams, Lynn Ratnavale and Melissa Conway of the Consumer and Governmental Affairs Bureau to discuss AT&T’s recently announced plans to cease providing third-party billing for “Enhanced Services” offered to our wireline customers.

As part of our discussion, we asked the Commission to allow providers sufficient time to implement any new anti-cramming rules. We also discussed our concerns that a requirement to notify customers on bills and websites that they may submit complaints and inquiries directly to the Commission would increase the number of complaints that the FCC would receive as well as cause a delay in resolving the customer’s complaint.

Moreover, we explained that third party charges on wireless bills are quite different from those on wireline bills and cramming is not a significant problem for the wireless industry. We encouraged the Commission to avoid regulation and allow the mobile industry to develop industry best practices in order to protect consumers from cramming.

If you have any questions, please contact the undersigned.

Sincerely,

/s/ Toni R. Acton

Toni R. Acton
Director

cc: John Adams
Melissa Conway
Michael Jacobs
Kris Monteith
Lynn Ratnavale
Kurt Schroeder
Mark Stone

