LEAST
COST
ROUTING

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

June 18, 2012

Dear Chairman Genachowski:

As a small business owner, I felt compelled to write this letter to express my concern over your Notice of Proposed Rulemaking as it pertains to third-party billing. Our company, Least Cost Routing, Inc. is a telecommunications firm that provides long distance services to hundreds customers across the country.

For more than 15 years, our 20 employees in Nevada have provided valuable services to our customers. While we applaud your efforts to protect consumers from phone bill cramming, we also strongly believe that third-party billing services are of great importance to businesses and consumers alike. They must be preserved in any new rules that are implemented for the industry.

Specifically, the FCC's proposed "opt-in" requirement fails to make a distinction for wireline carriers, who inherently provide an opt-in through the affirmative process of placing a collect or long distance call. We believe that implementing an additional consent process is unworkable for wirelines, and may result in increased costs for businesses and consumers in already difficult economic times.

Indeed, all consumers should be protected from phone bill cramming. However, we strongly believe that the FCC's proposed rule is inefficient and has unintended consequences. More effective ways to thwart the practice are available, such as requiring stronger industry standards for reviewing merchants before they are permitted to include their charges on a consumers' phone bill. This will help weed out the bad actors, without punishing businesses like mine which have faithfully and reliably served thousands of customers or the consumers who benefit from our services.

I urge you to consider the millions of Americans who would see their phone bills increase and the many small businesses, like my own, that will be negatively impacted by a decision to require an "opt-in" to third-party billing services. The financial impact felt across the country will be significant.

Thank you for your consideration.

Sincerely,

Ned Gershenson

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