

20 June 2012

The Honorable Julius Genachoski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

COMMENTS OF SILV COMMUNICATION INC.

Dear Chairman Genachoski:

Silv Communication Inc. (Silv), hereby respectfully registers its concerns, distress, and unease in the FCC proposed "opt-in" to third-party billing services requirement. As a small business owner, I felt compelled to write this letter to express my concern.

Silv Communication Inc. of 3460 Wilshire Blvd., Ste. 1103; Los Angeles, California 90010 hereby, respect, presents, advances and offers the following enumerated comments, opinions, exegeses, reactions, rejoinders, elucidations and, counterclaims to the proposed "opt-in" requirement.

1. Silv Communication Inc. (Silv), is a provider of non-facilities-based interexchange telecommunications services. It is authorized to provide international, Intrastate, and intrastate telecommunication service in more thirty three (33) states across the United States. Silv has been providing long distance service since early 2001.

2. BSG is the incumbent carrier billing service for Silv. Silv has no legal relationship with this billing service or with any other telecommunications companies. Silv bills its flat rate, measured and unlimited long-distance telephone service anywhere in the United State and Canada through the incumbent carrier services and Silv does not bill any other type of services.
3. Silv engages with separate telemarketing companies and a sale is verified by Independent Third Party Verification Company and does not solicit subscribers through the Internet.
4. 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. We believe that implementing an additional consent process is unworkable for wireline, and may result in increased costs for businesses and consumers in already difficult economic times.
5. Silv confirms every change of carrier through the Independent Third Party Verification Company that audio taped verification process that he/she is authorizing Silv to become his/her long-distance telephone service provider. No change or bills are made unless the potential subscriber gives his/her affirmative verbal assent to the switch of the long-distance.

6. 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 and the consumers who benefit from our services.

7. The strenuous and assertive efforts and fastidiousness of the Commission in its seemingly injudicious, perfunctory, and extraneous expedition, crusade, and quest to establish, ordain and/or decree additional, extraordinary, and supernumerary rules, regulations, protocols, canons, phraseology, and prolixity in the Commission's new and improved formula "empowering consumers to prevent and detect billing for unauthorized charges, implies, suggests and, intimates an affront to the First Amendment of the United States Constitution.

8. It has always been the clear and apparent policy, methodology and, practice of Silv to detect, prevent and, prohibit any and all unauthorized long-distance telephone charges ("slamming" and/or "Cramming") from ever being placed on the telephone statement, bill, and/or invoice of its present or future subscribers. To reiterate: Silv offers its long-distance telephone services only to small and media businesses. A small business manager and/or owner should easily be able to recognize that the long-distance telephone charges are from Silv and not from the local or any other long-distance telephone service provider. The most obvious safeguard that a small-business owner/manager can use is to carefully read their telephone statement for each month.

9. Small-business subscribers are the only consumers who utilize or employ the types and classifications of long distance telephone promotions and services exhibited and proved by Silv. No telephone services of any kind are offered to residential consumers except under a doing business-as embodiment in which the business is actually inside of the subscriber's residence. Silv professes and asserts that it is proposed "opt-in" requirement that implementing an additional consent process is unworkable for wirelines, and it will result in increased costs for businesses and consumers in already difficult economic time.

We urge the FCC 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,



SK. Golam Ahia
President
Silv Communication Inc.