

Rick Miranda
United States Hispanic Chamber of Commerce
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Brooklyn, New York 11214

June 21, 2012

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

Re: FCC-2012-0164

Dear Chairman Genachowski:

As President and CEO of a national organization representing the interests of the Hispanic business community, I am writing to express opposition to the proposed regulations involving wireline third-party billing Notice of Proposed Rulemaking. While we commend your commitment to protecting consumers against “cramming,” I believe that third-party billing for wireline telecommunications services are of great importance to many hispanic Americans. Efforts to prohibit these services represent an unnecessary overreach with consequences that will harm minority-run small businesses and, in turn, the nation’s economy.

As you consider the proposed rule, I strongly urge you to consider the current economic climate. Small businesses, which are responsible for the creation of more than 60 percent of all jobs in the United States, are struggling to stay afloat. With economic indicators continuing to lag and national unemployment hovering near 8 percent, the FCC should not advance policies that can needlessly hinder businesses’ ability to grow and create jobs.

Unfortunately, proposals to limit third-party billing, or ban it outright, would do just that. Third-party billing for wireline telecommunications services allows businesses to consolidate multiple services onto a single bill, thereby eliminating overhead and administrative costs, as well as the need to use high-interest credit cards to pay for services. Reduced operating costs keep prices low for consumers. Without third-party billing, businesses will lose a valuable, cost-effective way to stay competitive and expand their business.

While I applaud your efforts to protect consumers from cramming, our country cannot afford growth restricting regulatory policies that would hurt small businesses and their ability to create jobs. Most notably, a May 10, 2012 Executive Order “Identifying and Reducing Regulatory Burdens specifically stated that unjustified regulatory burdens and costs should be carefully examined, considering the current economic climate. I ask that the Commission consider rules that preserve the benefits of wireline third-party billing while adequately weighing the interests of the hispanic-owned business and consumer communities.

Sincerely,

Rick Miranda

President & CEO, United States Hispanic Chamber of Commerce