



CLEARWORLD

C O M M U N I C A T I O N S

August 16, 2012

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

Dear Chairman Genachowski:

As a small business owner, I am writing to express concern over recent reply comments to the FCC's Notice of Proposed Rulemaking pertaining to wireline third-party billing. Our company, Clear World Communications Corporation, is a telecommunications firm that provides Dial One Long Distance Service, services to 20,278 customers. Specifically, I wish to address erroneous comments regarding landline third-party billing and its association with "cramming." Each year, millions of Americans use wireline third-party billing to access legitimate services that allow them to stay connected in a manner that saves costs for consumers and small businesses.

In particular, I object to the Federal Trade Commission's reply comment to the FCC's Notice of Proposed Rulemaking, referring to wireline third-party billing as "used almost exclusively by scam artists."

This is simply untrue. Wireline third-party billing provides invaluable services for consumers and small businesses alike. Hundreds of thousands of households rely on third-party billing to make calls to loved ones in the U.S. and abroad. Additionally, wireline third-party billing allows businesses to consolidate multiple services onto a single bill, eliminating overhead and administrative costs as well as the need to use high-interest credit cards to pay for those services. Reduced operating costs in turn keep prices low for consumers. Without the competition generated by third-party billing, these businesses would lose a valuable, cost-effective way to stay competitive and expand their business.

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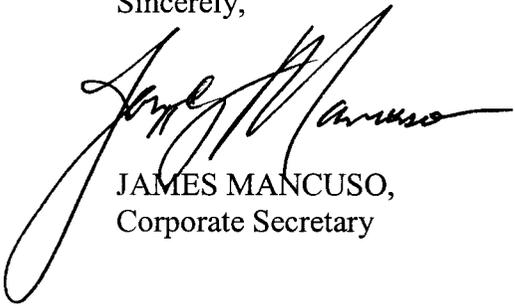
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For more than 14 years, our 50 employees based in California have provided valuable services to our customers. Our company is part of a large community of legitimate service providers that are facilitated through wireline third-party billing, ranging from long distance and collect calling services to operator assisted calling, among others.

As you consider your proposed rule, I urge you to take into account the wide array of legitimate services made possible through wireline third-party billing. I further urge you to consider the ramifications for the millions of Americans who would see their phone bills increase and the many small businesses that will be negatively impacted by a decision to require an "opt-in" to third-party billing services.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "James Mancuso", written over a large, stylized flourish that extends downwards and to the left.

JAMES MANCUSO,
Corporate Secretary

JM/sl