

AUG 21 2012


**American Telecommunications Systems, InECC Mail Room**


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August 16, 2012

**Via Overnight Delivery**

Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 Office of the Secretary  
 445 12<sup>th</sup> Street, SW  
 Washington, DC 20554  
 Attention: Chief, Pricing Policy Division, Wireline Competition Bureau

Re: CC Docket No. 94-129  
 Drop-Off Exemption Certification for American Telecommunications Systems, Inc.

Dear Ms. Dortch,

In its Third Order on Reconsideration and Second Further Notice of Proposed Rulemaking, released March 17, 2003 ("Order"), the Federal Communication Commission partially overturned its requirement that a carrier's sales agent must drop-off a sales call once the sales agent has initiated independent third-party verification using a three-way conference call. Under prior FCC rules, for sales that are verified through a three-way conference call or a call through an automated verification system, a carrier's sales agent must drop off the call once the three-way connection has been established. In the Order, the FCC created an exemption to the "drop-off" rule for any carrier that certifies to the FCC that their sales agents are unable to drop off the sales call after initiating a third party verification.

Please accept this letter as the company's certification that its sales agents are unable to drop off the sales call after initiating third party verification. The sales agents are unable to drop off the sales call because compliance is not feasible since the company lacks the technical means to comply with the requirement.

We have enclosed an extra copy of this letter, to be date-stamped and returned to us in the self-addressed, stamped envelope, which is also enclosed.

I, Bill Stathakaros, pursuant to 28 U.W.C. § 1746, declare that the foregoing is true and correct, under penalty of perjury.

Signed this 16<sup>th</sup> day of August, 2012.

Mr. Bill Stathakaros, President  
 AMERICAN TELECOMMUNICATIONS SYSTEMS, INC.

Signature of Officer

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