

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of the)
)
Rules and Regulations Implementing)
) **CG Docket No. 02-278**
the Telephone Consumer Protection)
)
Act of 1991)

Joe Shields Opposition to the Ex Parte Presentation of ACA International

ACA International filed a Notice of Ex Parte with the Commission on 02/22/13. The Notice fails to meet the minimum standards set forth by the Commission. “A person who makes an oral ex parte presentation subject to this section shall submit to the Commission’s Secretary a memorandum... Memoranda must contain a summary of the substance of the ex parte presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required. See 47 C.F.R. §1.1206(b)(1) The Ex Parte Memorandum of ACA International fails to provide, other than one extremely terse sentence, a proper summary of the substance of the Ex Parte presentation.

A reading of the Ex Parte Memorandum does not set forth what legislative initiatives have been undertaken or what the concerns of ACA International are with litigation concerning the TCPA. The presenter should not be allowed to meet behind closed doors with members of the Commission and then to obfuscate the reasons for such a meeting. I am certain that members of the public are extremely interested in the efforts of ACA International to neuter the protections of the TCPA. Members of the public deserve a fair and full disclosure of any Ex Parte meetings with the Commission. I

respectfully request that ACA International be directed by the Commission to file a proper Ex Parte Memorandum to insure fairness and full disclosure in the proceeding.

Respectfully submitted,

_____/s/_____

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