

**WILLIAM H. SORRELL**  
ATTORNEY GENERAL

**SUSANNE YOUNG**  
DEPUTY ATTORNEY GENERAL

**WILLIAM E. GRIFFIN**  
CHIEF ASST. ATTORNEY GENERAL



TEL: (802) 828-3171  
FAX: (802) 828-2154

**STATE OF VERMONT  
OFFICE OF THE ATTORNEY GENERAL  
109 STATE STREET  
MONTPELIER  
05609-1001**

October 11, 2013

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: Refreshing the Record Regarding "Cramming"  
CG Docket No. 11-116 and 09-158; CC Docket No. 98-170

Dear Commissioner Clyburn:

The Attorneys General of Indiana and Vermont thank you for the opportunity to refresh the Commission's record on the national mobile cramming problem. As the Commission noted in its August 27, 2013 Public Notice, "in May 2013, forty state and territorial attorneys general wrote the Federal Trade Commission (FTC) to express concerns about the growth of cramming on CMRS bills." As the co-sponsors of the May 2013 comments to the FTC, we urge the Commission to take those comments under advisement in its deliberations. In our view, the May 2013 comments to the FTC continue to portray an accurate and alarming picture of the problem of mobile cramming.

Please feel free to contact Kate Whelley McCabe, Assistant Attorney General, Office of the Vermont Attorney General, 802-828-5621, or [kwhelleyMcCabe@atg.state.vt.us](mailto:kwhelleyMcCabe@atg.state.vt.us) with any questions about this comment or the May 2013 comments to the FTC.

Respectfully,

Handwritten signature of William H. Sorrell in blue ink.

William H. Sorrell  
Attorney General of Vermont

Handwritten signature of Greg Zoeller in black ink.

GREG ZOELLER  
Attorney General of Indiana