

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Rules and Regulations Implementing the)	WC Docket No. 11-39
Truth in Caller ID Act of 2009)	
)	

**COMMENTS
of the
NATIONAL EXCHANGE CARRIER ASSOCIATION, Inc.;
NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION;
ORGANIZATION FOR THE PROMOTION AND ADVANCEMENT OF SMALL
TELECOMMUNICATIONS COMPANIES;
WESTERN TELECOMMUNICATIONS ALLIANCE; and
EASTERN RURAL TELECOM ASSOCIATION**

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I. INTRODUCTION AND SUMMARY

The Commission requests comment¹ on proposed rules implementing provisions of the Truth in Caller ID Act of 2009 (The “Act”).² The Act makes it “unlawful for any person within the United States, in connection with any telecommunications service or IP-enabled voice service, to cause any caller identification service to knowingly transmit misleading or inaccurate caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value.”³ The Act requires the Commission to issue implementing regulations by

¹ *Rules and Regulations Implementing the Truth in Caller ID Act of 2009*, WC Docket No. 11-39, Notice of Proposed Rulemaking, FCC 11-41 (rel. Mar. 9, 2011) (NPRM).

² Pub. L. No. 111-331, codified at 47 U.S.C. § 227(e).

³ The Act specifies that the penalty for a violation of the Act “shall not exceed \$10,000 for each violation, or 3 times that amount for each day of a continuing violation, except that the amount assessed for any continuing violation shall not exceed a total of \$1,000,000 for any single act or

June 23, 2011, and also requires the Commission, by the same date, to submit a report to Congress on whether additional legislation is necessary to prohibit the provision of inaccurate caller identification information in technologies that are successor or replacement technologies to telecommunications services or IP-enabled voice services.⁴

In response, the Commission proposes to add a new section 64.1604 to the current rules governing Calling Party Number (CPN) services and to re-designate current section 64.1604 as 64.1605.⁵ The Commission also proposes to modify current forfeiture rules to match requirements in the Act, and add new definitions for “Caller Identification Information,” “Caller Identification Service,” “Information Regarding the Origination,” and “Interconnected VoIP Service.”⁶

NECA, NTCA, OPASTCO, WTA and ERTA (the “Associations”)⁷ support these proposals and note in these comments the important relationship between Caller ID rules and the

failure to act.” These forfeitures are in addition to penalties provided for elsewhere in the Communications Act. 47 U.S.C. § 227(e)(5)(i).

⁴ NPRM ¶ 2 (citing 47 U.S.C. § 227(e)(4)).

⁵ NPRM Appendix A.

⁶ NPRM ¶¶ 15-18, 29-30.

⁷ The National Exchange Carrier Association, Inc. (NECA) is responsible for preparation of interstate access tariffs and administration of related revenue pools, and collection of certain high-cost loop data. *See generally*, 47 C.F.R. §§ 69.600 *et seq.*; *MTS and WATS Market Structure*, CC Docket No.78-72, Phase I, Third Report and Order, 93 FCC 2d 241 (1983). The National Telecommunications Cooperative Association (NTCA) is a national trade association representing more than 580 rural rate-of-return regulated telecommunications providers. The Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) is a national trade association representing approximately 470 small incumbent local exchange carriers (ILECs) serving rural areas of the United States. The Western Telecommunications Alliance (WTA) is a trade association that represents over 250 small rural telecommunications companies operating in the 24 states west of the Mississippi River. The Eastern Rural Telecom Association (ERTA) is a trade association representing approximately 68 rural telephone companies operating in states east of the Mississippi River.

Commission's existing rule governing the provision of call signaling information, which the Commission has proposed to amend in a separate, but concurrent proceeding on Universal Service Fund (USF) and intercarrier compensation (ICC) reform.⁸

A large part of the solution to both caller ID "spoofing" and "phantom traffic" is for the Commission to require carriers and other voice service providers to send correct CPN data in the call signaling information. The Associations encourage the Commission to ensure its efforts in both areas are consistent, that the rules apply as broadly as possible to all voice service providers, and to adopt both sets of rule amendments in the same timeframe.

In addition, as context for the comments that follow, NTCA, OPASTCO, WTA and several rural rate-of-return local exchange carrier ("RLEC") members recently visited with Commission staff to express concern about the epidemic of call termination problems on the public switched telephone network (PSTN) (the "call termination ex parte").⁹ Across wide swaths of rural America, residential and business customers, schools, and public safety agencies are experiencing a variety of problems in receiving (or not receiving) calls placed from locations within the same state and in other states. These problems include, but are not limited to: (1) incorrect caller ID that displays to called parties (to the extent such calls reach the RLEC

⁸ *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13 (rel. Feb. 9, 2011) (*ICC/USF Reform NPRM*).

⁹ See, *Ex Parte* notice, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, *Call Blocking by Carriers*, WC Docket 07-135; *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Rules and Regulations Implementing the Truth in Caller ID Act of 2009*, WC Docket No. 11-39, NTCA, *et al.* (March 11, 2011). "March 11 *ex parte* notice

network at all); (2) calls that ring for the calling party, but not at all or on a delayed basis for the called customer of the RLEC; (3) calling parties who receive incorrect or misleading message interceptions before the call ever reaches the RLEC or the tandem it subtends; and (4) calls that appear to “loop” between intermediate providers, but never reach the RLEC or the tandem it subtends; and, of greatest importance to the present NPRM,. The Associations therefore have a substantial interest in the Commission taking any and all steps as soon as possible to address caller ID spoofing and other problems that are effectively turning the long distance market into an unregulated “Wild West.”

II. THE TRUTH IN CALLER ID RULES SHOULD APPLY BROADLY TO ALL VOICE SERVICE PROVIDERS REGARDLESS OF TECHNOLOGY

The Commission proposes in this proceeding to define “IP-enabled voice service” to mean the same as its current definition of “interconnected VoIP service” (47 C.F.R. § 9.3). The Commission’s current definition of interconnected VoIP service reads:

An interconnected Voice over Internet Protocol (VoIP) service is a service that: (1) Enables real-time, two-way voice communications; (2) Requires a broadband connection from the user's location; (3) Requires Internet protocol-compatible customer premises equipment (CPE); and (4) Permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.¹⁰

The Commission also asks, however, if it should instead use the definition of IP-enabled voice service found in 18 U.S.C. § 1039(h)(4), as suggested in a letter filed Jan. 26, 2011, by the Department of Justice (DOJ).¹¹ The Title 18 definition is broader than the Commission’s proposed definition in that it does not require the user to have a broadband connection, and

¹⁰ 47 C.F.R. § 9.3, Definitions.

¹¹ *NPRM* ¶ 15.

would not require that users be able to originate traffic to *and* terminate traffic from the PSTN.

That definition reads:

The term “IP-enabled voice service” means the provision of real-time voice communications offered to the public, or such class of users as to be effectively available to the public, transmitted through customer premises equipment using TCP/IP protocol, or a successor protocol, (whether part of a bundle of services or separately) with interconnection capability such that the service can originate traffic to, or terminate traffic from, the public switched telephone network, or a successor network.¹²

The Associations agree with the DOJ that a broader definition of the term “IP-enabled Voice Service” should be used and urge the Commission to adopt this definition not only for its caller ID rule (64.1604), but also for its call signaling rule (64.1601) as well. The broader definition will ensure caller ID requirements would apply to all voice services, regardless of technology used today and in the future and regardless of network configurations used to connect customers and transport calls. The market for voice services is rapidly evolving, as is the technology, but there is no reason to believe that customers will not continue to want Caller ID services when a call is originated with or without a broadband connection,¹³ and regardless of whether calls connect with the PSTN.¹⁴

Caller ID services rely to a large extent on having the correct call signaling information, *i.e.*, the CPN. Therefore, this broader definition should also be applied consistently to the amended call signaling rules (§ 64.1601). All providers who offer voice services to the public

¹² *Id.* at 8 n.31.

¹³ Cable telephony voice services and Verizon’s FiOS voice services can be purchased separately from their broadband Internet access service.

¹⁴ The current definition of “PSTN” seems ready to evolve as well, as networks become fully IP-based. There are those that argue the Internet backbone is not part of the PSTN, even though it is required to connect the numerous Internet local access networks.

for a fee should be required to send the CPN data in the call set-up signal in order to meet the goals of both sets of rules.

The Commission should also consider that it would defeat the purpose of implementing the prohibition on caller ID spoofing if there is no corresponding requirement for all IP-enabled networks (including not only interconnected VoIP providers, but also other IP-services that allow the placement of calls and IP-enabled least-cost route providers “in the middle”) to ensure that the caller ID information (i.e., the CPN and other relevant data in the signaling stream) is conveyed without modification or deletion all the way from the originating caller to the called party. Indeed, as explained in the call termination *ex parte* visit to the Commission in March by the Associations and several RLECs,¹⁵ the problem of incorrect or “garbled” caller ID information represents a substantial and growing problem, as customers in rural America may often fail to answer calls where they do not recognize (or cannot comprehend) the information being displayed on their caller ID device – even when they may in fact know the caller and actual originating telephone number. It is therefore essential that the proposed rules apply in the context of all services that are able to originate calls destined for a point on the PSTN, whether or not those services may technically permit the receipt of calls from the PSTN and regardless of whether those services rely upon a particular technology at one point or another to enable the placement of calls to the PSTN.

The Commission also requests comment on whether the proposed amendments to the CPN rule and the forfeiture rules should use the same phrase when referring to “person” in the law.¹⁶ The proposed rules stipulate:

¹⁵ March 11 *ex parte* notice.

¹⁶ *NPRM* ¶ 20.

“No *person or entity* in the United States, shall, with the intent to defraud, cause harm, or wrongfully obtain anything of value, knowingly cause, directly or indirectly, any caller identification service to transmit or display misleading or inaccurate caller identification information.”¹⁷

The Commission points out the term “person or entity” would make clear the rules are not limited to natural persons and would be consistent with the Commission’s current rule concerning the delivery of CPN (§ 64.1601).¹⁸ On the other hand, the Commission’s proposed amendments to the forfeiture rules use the term “person” in order to be consistent with the use of the term “person” in the current forfeiture rules. The Commission makes clear however, in both cases it intends the rules to cover any entity considered a “person” under the Communications Act.¹⁹

The person or entity that “knowingly” causes the caller ID service to transmit or display misleading or inaccurate information may in some cases be a carrier or other service provider, rather than the calling party.²⁰ RLECs report numerous instances where carriers and other service providers strip or otherwise alter caller ID information to avoid paying ICC charges.²¹ To the extent this activity occurs in order to evade applicable ICC charges, it would appear to indicate a clear intent to defraud and/or wrongfully obtain something of value, *i.e.*, an RLEC’s network termination service without payment.

¹⁷ *Id.*, Appendix A Proposed Rules, § 64.1604, Prohibition on transmission of inaccurate or misleading caller identification information (emphasis added).

¹⁸ *Id.* ¶ 20.

¹⁹ 47 U.S.C. § 153(32) (“The term ‘person’ includes an individual, partnership, association, joint-stock company, trust or corporation.”). It also asks whether it should exclude any class of persons or entities from the definition of “person” and if so, whom should be excluded, and should the same rules apply to individuals and businesses.

²⁰ *NPRM* ¶ 13.

²¹ Joan Engebretson, *How Some VoIP and Other Carriers Avoid Access and What Some Small Telcos Want to Do About It*, Feb. 24, 2010, Telecompetitor, available at <http://www.telecompetitor.com/how-some-voip-and-other-carriers-avoid-access/>

In addition, if any person or entity is permitted to substitute “calling platform” or “gateway” information for the telephone number of the true originating caller, the rules that the Commission adopts here with respect to the display of Caller ID will do little, if any, good. The Commission should therefore find that substitution of or other modifications to the original calling party’s telephone number by any person or entity along the call path in a manner that results in any number other than the original caller’s telephone number to appear on a Caller ID device shall constitute a “knowing” effort to manipulate caller ID information “with the intent to defraud, cause harm, or wrongfully obtain anything of value.”

The Associations thus urge the Commission to implement its proposed rule language to make clear it would be a violation of its Caller ID rules for any entity, including any carrier or IP-enabled voice service provider, to knowingly transmit misleading or inaccurate Caller ID information.

III. THE COMMISSION’S CALLER ID RULES AND THE CALL SIGNALING RULES SHOULD INCLUDE ADDITIONAL SIGNALING REQUIREMENTS

The Commission proposes to define “Caller Identification Information” as information “regarding the telephone number of, or other information regarding the origination of, a call made using a telecommunications service or interconnected VoIP service.”²² The Commission proposes this information include any:

- (i) telephone number;
- (ii) portion of a telephone number, such as an area code;
- (iii) name;
- (iv) location information; or
- (v) other information regarding the source or apparent source of a telephone call.²³

²² *NPRM* ¶ 16.

²³ *Id.* ¶ 19.

The Commission asks if this definition should explicitly reference information transmitted in the SS7 Jurisdiction Information Parameter (JIP)²⁴ that provides information about the location of a caller who has ported his number or is calling over a mobile service, and if the proposed definition provides sufficient clarity about what is included.

The Associations welcome a Commission requirement that providers of Commercial Mobile Radio Service (CMRS) and VoIP services populate the JIP in signaling data.²⁵ Caller location, rather than just rate center information, is necessary for providing a more accurate understanding of where a call is coming from.²⁶

It appears there is no significant technical barrier to including JIP data in signaling streams, particularly as advances in technology continue to make it easier to transmit information regarding caller location. In comments filed on the Commission's proposed new call signaling rules, several carriers indicated that JIP data is now widely used in SS7 signaling and is available in Session Initiation Protocol (SIP) messages.²⁷ Verizon Wireless now offers customers a feature called "City ID," which "is an enhanced mobile Caller ID service that displays the city

²⁴ The JIP is the six-digit NPA-NXX of the originating switch.

²⁵ Use of JIP also has law enforcement and public safety benefits and, for example, can be used for improved routing of emergency. *See, e.g.*, Hypercube Comments, Apr. 1, 2011, n. 37.

²⁶ As the Associations have pointed out in other proceedings, disputes regularly arise over the originating location of mobile and VoIP calls, which result in disputes over the appropriate ICC rate to bill. Mobile service providers often argue CPN data does not provide sufficient information to identify the actual location of the calling party, but often object to any requirement to populate the JIP field as a way of addressing this problem. They argue that traffic studies or factors should be used for billing purposes. *See* Comments of NECA, *et al.*, WC Docket No. 10-90 (filed Apr. 1, 2011) at 27; NECA Petition for Interim Order, CC Docket No. 01-92 (filed Jan. 22, 2008) at 6.

²⁷ Comments of Hypercube, WC Docket No. 10-90 (filed Apr. 1, 2011) at 16, 20. XO Comments, WC Docket No. 10-90 (filed Apr. 1, 2011) at 33. *See also* Comments of Frontier, WC Docket No. 10-90 (filed Apr. 1, 2011) at 13; Comments of Texatel, WC Docket No. 10-90 (filed Apr. 4, 2011) at 5; Comments of PAETEC, *et al.*, WC Docket No. 10-90 (filed Apr. 1, 2011) at 4 (asking the FCC to require providers to pass all signaling call detail necessary to bill intercarrier compensation, including JIP).

and state information of each incoming call.”²⁸ JIP data would allow carriers and IP service providers to identify the originating switch, or the first switch utilized when a mobile or an IP calls enters the PSTN, and thus have better information on the location of the calling party. Including JIP data or other information regarding the originating point of a call in the definition of “Caller Identification Information” will allow Caller ID services to display location information, per (iv) above and will help resolve ongoing ICC disputes. A requirement to send the JIP should thus be included in both the Caller ID rules as well as the call signaling rules.

IV. THE COMMISSION SHOULD MAKE CLEAR THAT THOSE PERSONS OR ENTITIES WHO MERELY PASS ALONG CALLER ID INFORMATION AND/OR DISPLAY CALLER ID INFORMATION AS RECEIVED FROM “UPSTREAM” PROVIDERS ARE NOT LIABLE FOR A VIOLATION OF THE ACT.

The Commission requests comment on whether any additional exemptions should be included in new Caller ID rules to avoid stifling “innovative new services.”²⁹ It is not clear, however, how rules requiring transmission of Caller ID information could stifle innovation. Services that conceal or disguise a calling party’s identifying information are not the innovative enterprises Congress intended to encourage.

The Commission also asks whether it should adopt any additional exemptions for providers engaging in legitimate conduct that could be implicated by the proposed rules.³⁰ It notes in many instances, carriers and providers merely transmit caller ID information received from other carriers, providers, or customers, which may be inaccurate. The Act’s requirement that a violation involve intent to defraud, cause harm, or wrongfully obtain anything of value

²⁸ See, http://support.vzw.com/clc/faqs/Features%20and%20Optional%20Services/city_id.html.

²⁹ *Id.* ¶ 24.

³⁰ *Id.* ¶ 23.

should, in theory, provide sufficient clarity, and thus innocent transmission of incorrect Caller ID information would not be a violation of the rules. That said, out of an abundance of caution, the Commission should explicitly state that those persons or entities who merely *pass along* caller ID information and/or *display* caller ID information as received from “upstream” providers are not liable for a violation of the Act. These providers have “no intent to defraud, cause harm, or wrongfully obtain anything of value,”³¹ and there is no way for such providers to tell with “ascertainable certainty” that their passive conduct as a vessel of caller ID information rises to the level of a violation of law.

V. THE COMMISSION SHOULD SEEK TO ADOPT ICC/USF SIGNALING RULES AND RULES TO IMPLEMENT THE TRUTH IN CALLER ID ACT IN THE SAME TIMEFRAME

The Commission should implement both the signaling rules to curb phantom traffic and the rules to implement the Truth in Caller ID Act concurrently. Both sets of rules address the proper identification of a call’s origination point, and the Caller ID rules institute penalties when an entity “knowingly” transmits or displays inaccurate caller ID information “with the intent to defraud, cause harm, or wrongfully obtain anything of value.”³² Simultaneous adoption of the Caller ID and call signaling rules would not only reinforce both sets of rules, since each requires the inclusion of CPN in the signaling streams, but also assist carriers in making the necessary changes in their networks at one time as opposed to a piecemeal fashion if the rules for each were adopted at different times.

The Caller ID rules must be implemented by June 23, 2011, and, as commenters indicated in response to the phantom traffic portion of the ICC/USF NPRM, the record is more

³¹ 47 U.S.C. § 227(e)(1).

³² NPRM ¶ 12.

than adequate for the Commission to act immediately in adopting revised call signaling rules.³³

Thus, the timeframe for adoption of the Caller ID rules is perfect for concurrent adoption of the call signaling rules to address phantom traffic.

VI. CONCLUSION

The Commission should ensure the rules it adopts to implement the Truth in Caller ID Act are consistent with changes to the call signaling rules to address phantom traffic. Specifically, both sets of rules should apply to all voice service providers regardless of the technology used to provide the particular service and, thus, the Commission should rely on the broader Title 18 definition of IP-enabled voice service, and retain the proposed language “person or entity.” Also, both the Caller ID rules and the call signaling rules should require transmission of the JIP, in addition to the transmission of correct CPN information, to assist in call originating location identification, and both should be adopted in the same timeframe. Finally, it would be useful for the Commission to explicitly state in the rules that those persons or entities who merely pass along caller ID information and/or display caller ID information as received from “upstream” providers are not liable for a violation of the Act.

April 18, 2011

Respectfully submitted,

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³³ See, e.g., CenturyLink, Comments, April 1, 2011, 25-26; US Telecom, April 1, 2011, 5-6.

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CERTIFICATE OF SERVICE

I, Adrienne L. Rolls, certify that a copy of the foregoing Comments of the National Telecommunications Cooperative Association in WC Docket No. 11-39, FCC 11-41, was served on this 18th day of April 2011 via electronic mail to the following persons:

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