



December 14, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: NOTICE OF EX PARTE PRESENTATION**

**Telecommunications Carriers' Use of Customer  
Proprietary Network Information and Other Customer  
Information: Petition for Rulemaking to Enhance Security and  
Authentication Standards for Access to Customer Proprietary  
Network Information  
CC Docket No. 96-155, RM-11277**

Dear Ms. Dortch:

On December 13, 2006, Matthew Dosch of Comporium, Jeffrey Lanning of Embarq, and the undersigned, collectively on behalf of the Independent Telephone & Telecommunications Alliance (ITTA), met with Michelle Carey of Chairman Martin's office to discuss the above-referenced docket.

The attached was presented to Ms. Carey and the participants discussed, *inter alia*, different treatment of residential and business CPNI that acknowledges the distinct privacy concerns and needs of each customer group. ITTA member companies recognize the need to accommodate specific business concerns, including: the provision of customer records to locations other than the billing address or point of originating service; business account needs for access to information by multiple internal contacts; and, flexibility to accord treatment tailored to specific business account holder needs. These factors support multiple methods of identity verification. ITTA members support optional pass-codes, but note that mandatory application of pass-codes is inconsistent with current customer choice; would impose substantial operational costs for smaller companies that lack economies of scale to absorb necessary OSS modifications and associated operator training; and, pass-codes have vulnerabilities.

Thank you for your attention to this matter.

Sincerely,

*s/Joshua Seidemann*  
Joshua Seidemann

Attachment / cc: Michelle Carey