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June 30, 2011

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

Re: CC Dkt. No. 94-129; Certification of Exemption from "Drop-Off" Requirement

Dear Ms. Dortch:

Long Distance Consolidated Billing Co. ("LDCB"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C.F.R. Section 64.1120.

The Commission established a mechanism in CC Dkt. No. 94-129 by which carriers certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two-year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 18 FCC Rcd 5099 (rel. March 17, 2003) ("Third Order on Reconsideration").

LDCB previously submitted a certification of exemption from the FCC's "Drop-Off" requirement on July 1, 2009. Under the FCC's Third Order on Reconsideration, LDCB's exemption from the "Drop-Off" rules is valid until July 1, 2011 – two years from the date on which LDCB's previous certification was submitted. In its Third Order on Reconsideration, the Commission stated that carriers that wished to extend their exemption must re-certify at the end of the two year period (and every two years thereafter) as to their continuing inability to comply with the "Drop-Off" requirement. *See* Third Order on Reconsideration at para. 35. Therefore, per the requirements of the Third Order on Reconsideration, LDCB is re-certifying to its continuing inability to comply with the "Drop-Off" requirements in advance of the expiration of its July 1, 2009 certification.

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The type of technology used by LDCB's telemarketing providers does not allow the person initiating a three-way call to "drop off" the line without also disconnecting the three-way call. Upgrading to a system which would allow LDCB's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for LDCB's telemarketing providers given their small size. Thus, the telemarketing providers are unable to comply with the "drop off" requirement. This precludes LDCB from complying with the "drop-off" rule. A Declaration signed by Jan Lowe, President of LDCB, made in support of these statements under Section 1.16 of the Commission's rules is enclosed herewith.

Questions regarding this certification should be addressed to the undersigned.

Sincerely,


A handwritten signature in black ink, appearing to be 'Cheng-yi Liu', written in a cursive style.

Cheng-yi Liu,
Counsel for Long Distance
Consolidated Billing Co.

Enclosure

DECLARATION

I, Jan M. Lowe certify that I am President of Long Distance Consolidated Billing Co. ("LDCB"); that I am authorized to make this certification for LDCB. I certify that LDCB is unable to comply with the "drop off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, the technology used by LDCB's telemarketing providers does not allow the person initiating a three-way call to "drop off" the line without also disconnecting the three-way call. Upgrading to a system that would allow LDCB's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for LDCB's telemarketing providers given their small size. Thus, the telemarketing providers, and LDCB, are unable to comply with the "drop off" requirement. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct. Executed on June 16, 2011.



Jan M. Lowe
President, Long Distance Consolidated Billing Co.