



Electronically Submitted

October 10, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 25504

**RE: 800 Response Information Services LLC's "Petition for Emergency Declaratory Relief"
dated October 10, 2018, under proceeding 96-115**

Dear Ms. Dortch:

Patriot Communications is an industry leader in advertising/marketing driven toll-free communications. Since 1989, Patriot has been integral in bringing IVR solutions to the toll-free industry.

Given the prolific use of cellular phones, the North American Numbering Plan (NANP) territorial districts are no longer as useful for geographical locations of phone numbers. The use of Cell ID during a toll-free call has brought the IVR industry forward in technology. A caller is able to dial a number and be routed to their nearest geographical location, thus creating a convenience for the cellular caller as well as allowing our customers to provide the newest and best technology in their IVR applications.

Patriot, and our industry partners, has spent countless hours and hundreds of thousands of dollars to bring this product to market. The loss of these location-based services will make these services obsolete.

Impact to mobile customers

- Mobile customers can no longer be located to find the nearest location (i.e., coffee shop, car rental facility, gym, mattress store, etc.).
- Split use toll free numbers (regional number used by different parties) can no longer be accurately managed.
- In the case of Verizon, the double opt-in will severely inconvenience the Verizon customer. They can no longer rely on this service when dialing a toll free number; instead, they will have to interact with text messaging in conjunction with a toll free call.
- Mobile customers will be required to interact with the IVR to enter information (i.e., zip code, state or city information, alternate phone number, etc.). Not only is this an inconvenience to the mobile user, it is also unsafe when the customer is driving. Many states have hands free laws while operating a motor vehicle. Mobile customers will be



further inconvenienced, since they will have to pull over to navigate the IVR, often resulting in a less accurate routing service, since a zip code is much broader than Cell ID.

- Mobile customers can no longer receive text messages from the IVR service that provides information like location for click to map, driving instructions, coupons and promo codes, etc.

Impact to Vendors (Patriot and other location-based service providers)

- Vendors have invested hundreds of thousands of dollars in programming, license fees, and marketing to bring this product to market. Recovery of that investment has been through the offering of services. With the service being disabled, we lose the ability to recover the investment.
- Forces the industry to step backwards with technology rather than being able to advance technology and services.
- Loss of revenue due to the loss of locatable phones.
- Loss of customers who specifically came to the vendor for this service.
- Loss of marketing tools for our customers.
- Loss of media buying and tracking for our customers as it relates to this technologically advanced service.
- Loss of revenue due to contractual obligations for licenses tied to this service as well as license fees for cellular databases.
- Some vendors will have to lay-off staff, since the product they were hired to handle is no longer available.
- Vendors will incur fees to redesign marketing materials and websites to remove this service.
- Vendors will incur fees to re-program existing IVR applications.

Patriot Communications respectfully asks that you review and rule on the Petition for Emergency Declaratory Relief by October 19, 2018, as that is when AT&T will cutoff the location services to all vendors.

Respectfully,

A handwritten signature in black ink, appearing to read "Doug Livingston", followed by a horizontal line.

Douglas S. Livingston
President, Chief Operating Officer