

Vanity International

Participating RespOrg

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October 17, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street Lobby, Room TW-A325
Washington, D.C. 20554

Re: Docket No. 95-155. In the matter of Toll-Free Service Access Codes,
CC Docket No. 17-192. Toll Free Assignment Modernization
CC Docket No. 96-115. In the matter of Telecommunication Carrier's Use of Customer
Proprietary Network Information and other Customer Information.

On behalf of the Association of Toll-Free Professionals (ATFP), I hereby submit
comments in support of the Petition for Emergency Declaratory Ruling by 800 Response
Information Services LLC, filed October 10, 2018.

Comments of ATFP

Members and associates of ATF Professionals hold many of the exclusive-by-market
vanity toll-free programs in existence today and have decades of toll-free experience. Programs
such as 1-800-Home-Care, 1-800-Pavement, 1-800-Injured, 1-800-800-Cars, 1-800-Lawyers,
and 1-800-Attorney are examples of exclusive-by-market licensing.

Recent carrier actions threaten to render local toll-free routing useless and unsafe, as
outlined the 800 Response Petition. The small businesses that benefit from these world-class
programs will be irreparably harmed if wireless carriers disrupt and/or interfere with the
completion of local calls to local businesses. The parties most affected include program owners,
franchise holders, and independent businesses.

Call completion is the essence of exclusive-by-market licensing and franchise location discovery. There is zero access or exchange of CPNI data between the calling and the called party. Rather, functional access is entrusted at the switching level, to call-routing platforms, solely for termination and billing. Surely, location data can be secured during its momentary use.

If wireless carriers interfere as proposed, millions of unsuspecting callers will be denied call completions to thousands of neighborhood businesses who, in turn, will be denied the benefit of their local advertising and good will. This amounts to an obstruction of on-going economic advantage, as location data has been reliably used for decades to locally route toll-free calls.

In addition, this unprecedented interference devalues all toll-free numbers including hundreds of 833 numbers slated in the upcoming FCC auction, especially those that connect buyers to local providers: 833-Buy-Homes, 833-New-Auto, 833-Insurance, 833-Repairs, 833-Remodel, 833-Rentals, 833-Realtor, 833-LawnCare, and many¹ more. Hundreds or thousands of local businesses would benefit from these world-class messages, but who will risk aggregating local affiliates when local callers can no longer connect to local businesses?

Over the coming weeks, we will encourage everyone affected to add their unique perspective to this matter. In the meantime, our prayer is that the FCC will mandate that the wireless carriers do no harm.

Respectfully submitted,

/Loren Stocker/

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¹ <https://tollfreemarket.com/top-tier-833-numbers>