**Exparte Notice**

In the Matter of )

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Toll Free Assignment Modernization ) WC Docket 17-192

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Toll Free Service Access Codes ) CC Docket No. 95-155

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March 1st 2018 Comet Media’s Director Samuel Sudderth had a conference call with the following people:

Ann Stevens - Competition Policy Division/Wireline Competition Bureau

Alex Espinoza – Competition Policy Division/Wireline Competition Bureau

Michelle Sclater - Competition Policy Division/Wireline Competition Bureau

Matthew Collins - Competition Policy Division/Wireline Competition Bureau

William Andrle - Competition Policy Division/Wireline Competition Bureau

Heather Hendrickson - Competition Policy Division/Wireline Competition Bureau

Pam Megna - Competition Policy Division/Wireline Competition Bureau

We discussed the following:

-If more costs or taxes are added to the current fees then Resporgs will release more numbers decreasing tax revenue for the FCC. Conversely if taxes and costs are lowered Resporgs will be able to increase revenue and therefore obtain more numbers and the FCC tax revenue would increase. NOTE\* You can see this in 2016 and 2017 where Resporgs release numbers before the FCC fee is levied in December.

-There are 6 million extra toll-free numbers still not used by any Resporg therefore it does not make sense to move all numbers to auction. Only vanity numbers should be set for auction and these parameters should be very strict. Letting market forces determine the value of these numbers is the only way for the FCC to see tax revenue from them and the only way for smaller companies to compete.

-In an effort to reduce fraud and costs across all Resporgs we believe 8YY origination costs should be reduced. They are out of sync with termination costs and there is no reason why they should be. Rate arbitrage induces traffic fraud and when high rates are high it’s a lucrative target for fraudster. My carrier believes that’s up to 30% of calls may be traffic pumping.

We appreciate your attention.

Samuel Sudderth