I ask the FCC to please consider my recommendations to exempt Independent RespOrg’s (non carrier/operator RespOrg’s) from being forced to collect the yearly Toll Free Regulatory Fee for the following reasons:

1. Independent RespOrg; An extension of SOMOS that is an “extension or enhanced” RespOrg that also issues RespOrg ID’s to their customers for the purpose of managing their TFN’s in the SOMOS Toll Free Number Registry. Independent RespOrgs are non-carrier affiliated and therefore do not profit from the underlying carrier transport services, do not remain in the call path, originate or terminate traffic over the PSTN or SIP or any other voice or IP network. Independent RespOrgs provide toll free number management services only, based solely on their client’s directions, serving ONLY their client’s best interests. We do not have subscribers as suggested in “Toll Free Section 10” we service the carriers who then service the subscribers or the enterprise business who then subscribes to the carrier for their TFN routing. Therefore, like SOMOS, we should not be required to collect this fee and submit, the FCC should collect directly from the carrier who provided the service to the subscriber.
2. Independent RespOrg’s are neutral number administrators and provide service to carriers and operators and not end user toll free users.
3. Independent RespOrg’s do not ‘own’ the toll-free numbers they manage and do not track and have zero access to track the end user customers that are the customer of record (owner) of the toll-free numbers.
4. Independent RespOrg number counts change on a minute by minute basis based on the requests of the carriers/operators we service.
5. Independent RespOrg’s are not in the transport layer so we have no authority to force a carrier/operator to pay the regulator fee and no process to collect the fee from the end user customer.
6. The carrier/operator should be the one required to collect the fee.

Thank you

Brian Lynott