

# TollFreeNumbers.com

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Federal Communications Commission  
Ajit Pai, Chairman  
445 12th Street, SW  
Washington, DC 20554

May 20, 2019

## **Re: WC Docket No. 17-192, CC Docket No. 95-155 – REPLY COMMENT FOR AUCTION OF TOLL FREE NUMBERS IN THE 833 CODE**

Dear Chairman Pai,

I hate to be the one to throw cold water on this, but aren't there regulations against a government agency just giving a multimillion dollar contract to the biggest industry insider, no matter how friendly they are with the FCC. I'm not a lawyer so I feel a little awkward pointing this out to all the lawyers out there who've obviously worked hard on this, but this looks potentially corrupt.

Somos has never run an auction, has never had a single retail customer, doesn't know the value of the numbers, and has HUGE potential conflicts and even said quite emphatically in their previous filings about this to the FCC that they would NOT be able to bypass the resporg system which they maintain and deal with customers directly. Yet the FCC seems to be assuming incorrectly, that nobody else can or would be willing to administer the auction, without even giving anyone else a chance.

I could name several organizations that would jump at the opportunity to administer the 833 auction. Any one of them would have more experience with retail customers and more knowledge about the value of numbers. They would do it cheaper and more efficiently and perhaps most importantly without the huge inherent conflicts that the administrator of the existing database who's role it is to *support the resporgs*, has if they are essentially required to encourage customers to *bypass the resporgs*, competing and undercutting their current role in the industry.

Are you trying to give Somos the secondary market or are you trying to create a free independent open and competitive secondary market, because you can't do both, and Somos can't (or shouldn't be forced to) both support and undercut the resporgs at the same time either. I've been in the toll free business for 25 years and love it, and am saying this only because this is just WRONG and wreaks of something bad, no matter how you look at it. I'm going to try to write a more thorough letter detailing the three major issues I see with this and the potential solutions I see, but I wanted to get this out there for some lawyers to comment on.

Very sincerely,

*Bill Quimby*  
Bill Quimby  
President of TollFreeNumbers.com

