

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of )  
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Advanced Methods to Target and Eliminate )  
Unlawful Robocalls )  
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CG Docket No. 17-59

**COMMENTS OF SOMOS, INC.  
IN RESPONSE TO THE PROFESSIONAL ASSOCIATION FOR CUSTOMER  
ENGAGEMENT'S PETITION FOR RECONSIDERATION**

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May 22, 2019

## INTRODUCTION & SUMMARY

By creating the Reassigned Numbers Database (RND), the Federal Communications Commission has taken a step toward stopping unwanted telephone calls.<sup>1</sup> The RND will contain information about when numbers have been disconnected, including Toll-Free numbers.<sup>2</sup> The Commission's *Order* puts the responsibility for reporting the disconnect status of Toll-Free numbers on Somos, Inc. (Somos), the Toll-Free Numbering Administrator (TFNA).<sup>3</sup>

In its petition for reconsideration, the Professional Association for Customer Engagement (PACE) objects to the inclusion of Toll-Free and business-landline numbers in the RND.<sup>4</sup> PACE believes that the burden on providers of reporting disconnect status of those numbers outweighs the benefits to the public of making that information available.<sup>5</sup> In its capacity as the TFNA, Somos can confirm that the Commission is correct that including Toll-Free numbers in the database will “result in only a small, incremental burden” on the TFNA.<sup>6</sup> Timely, accurate Toll-Free disconnect information is readily available and easy for Somos to relay.

## DISCUSSION

### I. The Scope Of Somos' Comments

Somos files this response to PACE's petition for the limited purpose of commenting on the impact of reporting the disconnect status of Toll-Free numbers to the RND. Somos expresses no opinion on any other aspect of PACE's petition, including any burden other reporters might

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Second Report and Order, CG Docket No. 17-59, FCC 18-177 (rel. Dec. 13, 2018) (*Order*).

<sup>2</sup> *Id.* ¶¶ 3, 22.

<sup>3</sup> *Id.* ¶ 23.

<sup>4</sup> *See Advanced Methods to Target and Eliminate Unlawful Robocalls*, Professional Association for Customer Engagement Petition for Reconsideration 4-9, CG Docket No. 17-59 (filed Apr. 25, 2019) (*PACE Petition*).

<sup>5</sup> *Id.* at 5, 11.

<sup>6</sup> *Order* ¶ 34.

bear in connection with other numbers (including non-Toll-Free business landlines) or whether the Commission should amend the *Order*'s safe-harbor provision.

## **II. The TFNA Is Not Burdened By Reporting Toll-Free Disconnect Data.**

In the *Order*, the Commission assessed the costs and benefits of a comprehensive database, including Toll-Free numbers, and decided that “exclusions will leave both callers and consumers vulnerable to calls misdirected to reassigned numbers.”<sup>7</sup> PACE's primary argument in support of reconsideration is that the costs to providers of reporting business-landline and Toll-Free disconnections outweighs what PACE sees as the minimal benefit of including that information in the database.<sup>8</sup> Somos addresses only the burden half of the cost-benefit equation (and only as it applies to Toll-Free numbers). Somos can confirm that requiring the TFNA to report Toll-Free disconnects does not impose a meaningful burden on the TFNA.<sup>9</sup>

The Commission recognized that there is a simple, straightforward way to report Toll-Free disconnect data. Rather than asking the 470-plus Responsible Organizations to individually supply this information, the Commission has directed the TFNA to do so.<sup>10</sup> That is an “expedient and efficient” choice.<sup>11</sup> As Somos told the Commission, “it would [be] more efficient for Somos, as the TFNA, to provide the collective information.”<sup>12</sup> And it is easy for the TFNA

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<sup>7</sup> *Id.* ¶ 20; *see id.* ¶ 22 (addressing reassigned Toll-Free numbers).

<sup>8</sup> *See, e.g., PACE Petition* at 5 (“[B]usiness landlines and other toll-free numbers should not be included in the RND because doing so will create an unnecessary burden for Providers ... while accomplishing nothing in achieving the Commission's goal....”); *id.* at 8 (“Thus, requiring business landline and toll-free number reassignments to be reported in the RND will do nothing more than increase the reporting burden placed on Providers and the costs of administering the database”); *id.* at 11 (“Including business and toll-free numbers in the RND is unnecessary to accomplishing the goals of the database and is an overly burdensome regulation.”).

<sup>9</sup> *Order* ¶ 22.

<sup>10</sup> *Id.* ¶ 23.

<sup>11</sup> *Id.*

<sup>12</sup> Letter from Joel Bernstein, Vice President, Regulatory and Public Policy, Somos, Inc., to Marlene Dortch, Secretary, FCC, CG Docket No. 17-59 at 1 (filed Nov. 20, 2018).

to perform this function as part of the service it provides to its customers (the Responsible Organizations): The TFNA already has “real-time visibility into each toll free number’s disconnection status.”<sup>13</sup> The Toll-Free Number Registry makes clear when a number has been disconnected (e.g., a number’s status has changed from Working to Disconnect) and reassigned (e.g., a number’s status has changed from Spare to Reserved).<sup>14</sup> As the TFNA, Somos has direct access to that data and can easily relay it to the RND administrator.

PACE argues that the risk of inaccurate reports will increase the burden on Toll-Free reporters.<sup>15</sup> PACE’s lone hypothetical regarding internal reassignment is not applicable to Toll-Free numbers. More broadly, the Toll-Free Number Registry is a well-managed system that accurately and efficiently handles a high volume of real-time requests to manage the administration and routing of Toll-Free calls. PACE’s petition does not provide any cause for concern about inaccuracies on this front.

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<sup>13</sup> *Order* ¶ 23.

<sup>14</sup> See SMS 800 TFN Registry, SMS/800 Toll-Free Number Registry User Guide 38-39 (2017), <https://tfnregistry.somos.com/smsnow-ui/Documents/SMS800-User-Guide.pdf>.

<sup>15</sup> See *PACE Petition* at 9 (“Including Business Landlines and Toll-Free Number[s] Will Create Inaccuracies”).

## CONCLUSION

Somos' experience as the TFNA reveals that it will not be "overly burdensome" to report Toll-Free disconnect data.<sup>16</sup> The TFNA can easily, efficiently, and inexpensively report Toll-Free disconnects to the RND.

Respectfully submitted,

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<sup>16</sup> *Id.* at 11.