

Vanity International

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May 23, 2018

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

Re: Ex Parte Meeting: Docket 17-192, CC Docket No. 95-155. In the matter of Toll Free Service Access Codes, Toll Free Assignment Modernization.

Dear Ms. Dortch,

On Monday, May 21, I met with Ann Stevens, Alex Espinoza, Matthew Collins, and William Andrie, concurrently joined with Michell Sclater, Heather Hendrickson, and Terry Cavanaugh by phone. Then, met separately with Jay A. Schwarz from the Chairman's office.

We discussed the history of toll-free numbers since portability, the filings on the proposed 833 "auction or lottery," and the chilling effect the prohibition of Direct Transfer of toll-free numbers has had on American businesses, since the Keller-Wade letter was issued.

I emphasized the confused premise of this letter, which refers to transfers "*between subscribers*" that were actually made "*without the subscriber's knowledge*"— and reiterated to staff that the industry wholly agrees that Direct Transfers must be expressly allowed.

I highlighted this language in Keller-Wade letter and left a copy in both meetings, as attached. To follow: additional examples where this prohibition has caused disruption.

I can be reached at (858) 792-5000 with any questions.

Respectfully submitted,

Loren Stocker
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