



Ex Parte Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CC Docket No. 95-155 Toll Free Service Access Codes;
CC Docket No. 96-115 Telecommunications Carrier's Use Of Customer
Proprietary Network Information And Other Customer Information
CC Docket No. 17-192 Toll Free Assignment Modernization

Dear Ms. Dortch:

On May 28, 2019 the undersigned of Ignition Toll Free and Noah Rafalko of MessageComm, met (via telephonic bridge) with Arielle Roth, Legal Advisor to Commissioner Michael O'Rielly.

The purpose of the teleconference was to provide a general background on the geographic routing of toll free numbers, to provide information about privacy protections inherent in process of routing toll free calls according to the geographic location of the caller, and current impediments to the timely and accurate geographic routing of toll free calls and the nature and source of those impediments.

We also suggested that the ability to timely and accurately route toll free calls would have a significant impact on the valuation of numbers auctioned from the 833 NPA. Because the ability to share individual numbers among a group of independent customers or to terminate such numbers to many franchisees based upon closest location expands to resource, tailors service to callers seeking to connect with the closest desired business, allows many businesses access to quality vanity toll free numbers, and presents an viable business case, the value of each number so used can increase significantly.

This "Shared Use" of high value numbers allows, for example, multiple entities to use 800-LAWYERS, depending on the origination location of the call. Were that number to be used by a single entity, providing services in a single state, the value of that number is diminished. Shared use will significantly increase the value of the most sought-after numbers in the 833 auction.

If the Commission were able to provide assurances to the mobile phone and other originating carriers that they both have the obligation to provide "fuzzy" (rather than precise) location information to toll free service providers and that in doing so they would



not be in conflict with privacy protections due to customers, then toll free service providers would be free to offer geographic routing and Shared Use services to customers with no undue call delay or latency or unnecessary caller interference. In the case of these services “opt in” or “opt out” is not just unnecessary, but also presents a hindrance and possible safety issue to callers, especially those that are operating motor vehicles. The Commission could achieve these goals through rendering a decision with respect to the Petition For Immediate Declaratory Relief or In the Alternative, Petition for Rulemaking, Filed by 800 Response Information Services, LLC, CC Docket No. 96-115.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruno Tabbi", written in a cursive style.

Bruno Tabbi

cc (via email):
Arielle Roth