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May 31, 2018

Ex Parte Filing

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

Re: WC Docket No. 18-28; CC Docket No. 95-155

Dear Ms. Dortch:

On May 29, 2018, Ann Berkowitz of Somos, Inc., and I met with Travis Litman of Commissioner Rosenworcel's Office and, on May 31, 2019, we met with Amy Bender of Commissioner O'Rielly's Office. Both meetings were regarding the proposed Declaratory Ruling and Notice of Proposed Rulemaking in the above-captioned dockets.

In each of the meetings, Somos explained the concerns that had given rise to Somos's 2016 Petition for Declaratory Ruling, including the text-enablement of Toll Free Numbers without subscriber permission and the text-enablement of unassigned numbers. Somos expressed its hope that the clear statement in the proposed Declaratory Ruling that Toll Free Numbers may not be text-enabled without subscriber consent will address the worst of these abuses. Somos also explained that, under current rules, subscriber consent cannot be confirmed without involvement of the Resp Org. *See* 47 C.F.R. § 52.101(b), (e).

This letter is being electronically filed for inclusion in the record of these proceedings. If you have any questions concerning this matter, please contact me at (202) 326-7921.

Sincerely,



Aaron M. Panner

cc: Amy Bender
Travis Litman