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June 20, 2018

Ex Parte Filing

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

Re: CC Docket No. 95-155; WC Docket 17-192

Dear Ms. Dortch:

On June 18, Ann Berkowitz, David Stewart and the undersigned, all from Somos, met with Ann Stevens, Heather Hendrickson (via phone), Matthew Collins, Alex Espinoza, William Andrie, Pam Megna, and Anthony Patrone of the Wireline Competition Bureau, and Margaret Weiner, Scott Mackoul, Gary Michaels, Rita Cookmeyer, and Eliot Maenner (via phone) of the Auctions and Spectrum Access Division of the Wireless Telecommunications Bureau.

Somos, as the neutral Toll-Free Numbering Administrator, does not take a position as to whether or not the Commission should auction the mutually exclusive numbers from the 833 Toll-Free Area Code opening. Nor does Somos take a position as to whether or not the Commission should remove its prohibition on the sale of Toll-Free Numbers (TFNs). The purpose of the meeting was to share information on the industry and Somos, and to identify some issues that the Commission will have to resolve should it decide to implement an auction and/or secondary market. Somos discussed ways in which auctions and a secondary market can be implemented efficiently, effectively, and in a way that would minimize potential harm to the industry.

Somos spoke about ways to conduct a single round auction. We discussed issues relating to the timing of the proposed auction, property rights of the winning bidders, potential changes in the Commission's rules to accommodate auctions, and post-auction distribution of any remaining the set aside 833 TFNs.

In addition, Somos spoke about the characteristics necessary to have a functioning, efficient secondary market, including trust in the ecosystem, transparency, and predictability. Somos outlined the various functions necessary for a successful secondary market and spoke about lessons learned from the domain name industry's secondary market experience.

Respectfully submitted,



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cc : Ann Stevens
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