

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:)
)
Petition of the Alliance for Telecommunications)
Industry Solutions 800 Service Management)
System Number Administration Committee) CC Docket No. 95-155
Requesting Bureau Action to Revise Toll-Free Code))
Opening Methodology)

REPLY TO COMMENTS OF SOMOS, INC.

Somos, Inc. (“Somos”) hereby submits these reply comments, pursuant to the Commission’s Public Notice,¹ in response to the comments filed by Mr. Bill Quimby of TollFreeNumbers.com,² regarding the Petition³ filed by the Alliance for Telecommunications Industry Solutions 800 Service Management System Administration Committee (“ATIS/SNAC”) requesting Wireline Competition Bureau action to revise the Toll-Free Code opening methodology.

Somos appreciates Mr. Quimby’s concerns and his efforts to offer suggestions to improve the Toll-Free Number (TFN) allocation system to benefit the actual end users. However, several

¹ *Wireline Competition Bureau Seeks Comment on Petition of the Alliance for Telecommunications Industry Solutions 800 Service Management System Administration Committee Requesting Bureau Action to Revise Toll Free Code Opening Methodology*, Public Notice, WC Docket No. 95-155, DA 16-445 (rel. May 4, 2016).

² *Comments of Mr. Bill Quimby in Petition to Revise Toll-Free Code Opening Methodology by the Alliance for Telecommunications Industry Solutions 800 Service Management System Administration Committee*, WC Docket No. 95-155, filed June 1, 2016.

³ *Petition to revise Toll-Free Code Opening Methodology by the Alliance for Telecommunications Industry Solutions 800 Service Management System Administration Committee*, WC Docket No. 95-155, filed April 5, 2016.

of Mr. Quimby's suggestions, while well-meaning, simply are not practical.

At this time, Somos does not have the capability to capture the amount of end user customer data that would be required to effectively monitor whether or not a particular TFN has an end user attached to it.⁴ Mr. Quimby suggests calling some end users to check whether or not there is an actual end user for the TFN. Because a Toll-Free subscriber can route a TFN to only accept calls from certain area codes or even certain exchanges, calling a TFN to verify that it is in service would result in a high number of false negatives. For example, a law firm with a TFN in Texas may only want to pay for phone calls originated from Texas, where its lawyers are licensed to practice. A call to that law firm originating from outside of Texas would result in that call not being completed as dialed.

In addition, a significant and growing use of TFNs is for ad tracking and marketing.⁵ Here, the Resp Org may be the end user. Somos would have no way to know whether or not the Resp Org is the legitimate end user, or if the Resp Org is warehousing the number by claiming to be the end user.

While Somos does conduct industry surveys from time-to-time, creating an entire new database to survey end users would entail significant time and expense. We strongly disagree with Somos publicly publishing the names of Resp Orgs who score highest and lowest on a customer satisfaction survey. We view that as inapposite to our role as the Neutral Toll-Free Administrator. We cannot publicly shame or laud any Resp Org based on a single survey.

⁴ Should the Commission require Somos to collect this information at some point in the future, depending on what is required, Somos could build this capability into the new SMS/800 platform. However, having such a capability completed in time for the 833 code opening, which will be conducted on the existing SMS/800 platform, is not practicable or economically reasonable.

⁵ Somos estimates that 15% of all TFNs are used in this manner, and the number may be as high as 20%.

Somos notes that the ATIS proposal did, indeed, request an affiliation rule similar to what Mr. Quimby advocates. Somos has been building this capability into our system for this code opening, a process that started many months ago. This would obviate the need to limit any new Resp Orgs coming online one year prior to the code opening from participating in the code opening, as suggested by Mr. Quimby. Under the ATIS proposal, which Somos supports, if a newly-minted Resp Org is affiliated with any existing Resp Org, the affiliated Resp Org will be limited to the parent company's allocation of 100 total TFNs in the new area code.

In sum, Somos continues to support the ATIS petition. While we believe Mr. Quimby has the industry's best interest at heart and he has started a very important discussion, Somos does not view many of the measures advocated as technically feasible or economically reasonable at this time.

Respectfully submitted,



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