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July 25, 2019

Via Electronic Submission

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Portals II, Room TW-A325
Washington, DC 20554

**Re: WC Docket No. 17-192, CC Docket No. 95-155 – Public Notice - AUCTION OF TOLL
FREE NUMBERS IN THE 833 CODE**


On July 23, 2019, Robert Vitanza and the undersigned of AT&T participated in a conference call with Kris Monteith, Justin Faulb, Pam Arluk, Heather Hendrickson, Matt Collins, Alex Espinoza, Jordan Reth, and Connor Ferraro of the Wireline Competition Bureau, along with Tajma Rahimic from the Office of Economics and Analytics.

In the meeting, AT&T expressed concerns about making RespOrgs solely responsible for providing Somos with secondary market transaction information and about the proposed penalty for failing to do so. AT&T explained, using various examples, that RespOrgs may be completely unaware of many secondary market transactions, even by their own subscribers. AT&T further explained how the proposal penalizes all of a RespOrg's subscribers for one subscriber's failure to act. AT&T asked that the Commission establish a window to allow RespOrgs, once they become aware of a secondary market transaction, to obtain the information from the subscriber before assessing whether to impose a penalty.

Pursuant to section 1.1206 of the Commission's Rules, this letter is being filed electronically with the Commission.

Please contact the undersigned if you have any questions.

Sincerely,


Jacquelyne Flemming

CC: Nirali Patel
Heather Hendrickson
Matthew Collins