

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Text-Enabled Toll Free Numbers)	WC Docket No. 18-28
)	
Toll Free Service Access Codes)	CC Docket No. 95-155

COMMENTS OF CENTURYLINK

I. INTRODUCTION

CenturyLink¹ files these comments in response to the *Declaratory Ruling and Notice of Proposed Rulemaking (Declaratory Ruling and NPRM)* released June 12, 2018, in the above-referenced dockets. CenturyLink appreciates the Commission addressing issues related to the provision of text enabling toll-free numbers to eliminate potential confusion and harm and to facilitate proper routing and delivery of messages.² The Commission's action to clarify that a toll-free subscriber must give prior authorization to text-enable a toll-free number makes sense and should take important steps towards protecting businesses and consumers alike.³ With respect to whether a single or multiple toll-free texting registries should be established,⁴ CenturyLink believes that either approach would be workable so long as any established registry provides its services efficiently and in a cost-effective manner.

¹ These comments are filed by and on behalf of CenturyLink, Inc. and its subsidiaries.

² *Text-Enabled Toll Free Numbers; Toll Free Service Access Codes*, WC Docket No. 18-28 and CC Docket No. 95-155, Declaratory Ruling and Notice of Proposed Rulemaking, FCC 18-77 (rel. June 12, 2018) (*Declaratory Ruling and NPRM*).

³ *Declaratory Ruling and NPRM* at ¶ 11.

⁴ *Declaratory Ruling and NPRM* at ¶ 19.

II. ANY TOLL-FREE TEXTING REGISTRY THAT MAY BE ESTABLISHED SHOULD OPERATE COST-EFFECTIVELY AND EFFICIENTLY

In the prior phase of this proceeding, the issue was raised whether a single, exclusive toll-free texting registry should be established. At that time, additional information was needed to determine whether it would be in the best interest of all parties in the toll-free numbering environment and the public to have a single registry (presumably SOMOS) or multiple registries. CenturyLink's comments at that time continue to hold true today. As a threshold matter, these registries should contain the routing information associated with all toll-free numbers upon which the enabling of text-messaging functionality would be based. In addition, these registries should be transparent and be made available to all for a reasonable charge.⁵ Such transparency is vital and necessary for fair operation, and unfortunately has been lacking in the past.⁶

CenturyLink continues to question whether creating a monopoly would serve the public interest, particularly if the entity were to operate on a for-profit basis rather than on a non-profit basis the way many other toll-free number management activities are handled.⁷ However, with

⁵ CenturyLink Comments, *Toll Free Service Access Codes; Somos, Inc. Petition for Declaratory Ruling Regarding Registration of Text-Enabled Toll Free Numbers*, CC Docket No. 95-155, WT Docket No. 08-7 (filed Dec. 5, 2016), at 6 (CenturyLink Comments).

⁶ Comments of AT&T, *Toll Free Service Access Codes; Somos, Inc. Petition for Declaratory Ruling Regarding Registration of Text-Enabled Toll Free Numbers*, CC Docket No. 95-155, WT Docket No. 08-7 (filed Dec. 5, 2016); Comments of CTIA, *Toll Free Service Access Codes; Somos, Inc. Petition for Declaratory Ruling Regarding Registration of Text-Enabled Toll Free Numbers*, CC Docket No. 95-155, WT Docket No. 08-7 (filed Dec. 5, 2016); Reply Comments of West Telecom Services, LLC, *Toll Free Service Access Codes; Somos, Inc. Petition for Declaratory Ruling Regarding Registration of Text-Enabled Toll Free Numbers*, CC Docket No. 95-155, WT Docket No. 08-7 (filed Dec. 20, 2016); Comments of Verizon, *Toll Free Service Access Codes; Somos, Inc. Petition for Declaratory Ruling Regarding Registration of Text-Enabled Toll Free Numbers*, CC Docket No. 95-155, WT Docket No. 08-7 (filed Nov. 13, 2017).

⁷ CenturyLink Comments at 2.

sufficient safeguards, either a single or multiple registries can prove workable. So long as an exclusive registry is efficiently operated on a cost-basis rather than a for-profit basis, then CenturyLink's concerns with an exclusive registry can be mitigated. While having multiple registries would help ensure cost efficiency and promote innovation through competition, there are other issues that may arise from having more than one resource. So long as multiple registries are established with principles of openness, transparency, and interoperability, however, then the concerns and potential inefficiencies associated with multiple resources can be effectively addressed and arguably drive more efficiencies and innovation than a single source registry. In all cases, regardless of whether a single registry or multiple registries are established, all registries should maintain neutral operations and management of process, be competitively neutral and not hinder or otherwise interfere with competition and operate on a cost-basis rather than on a for-profit basis.

III. CONCLUSION

CenturyLink appreciates the Commission taking further action to promote the efficient management and administration of text-enabled toll-free numbers. This rulemaking is a necessary step toward modernizing the provision of toll-free services through text enablement to ensure that businesses, non-profit organizations, and individuals can benefit from toll-free

texting. With the safeguards discussed above, either a single registry or multiple registries could prove workable for the performance of administrative duties in a fair and efficient manner to help promote the innovative use of toll-free texting capability.

Respectfully submitted,

CENTURYLINK

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