

**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



MessageComm:

A fast growing messaging and communications trade association that's corralling the expertise of all text messaging players, from carriers to large enterprises, registries to RESP ORGs.

MessageComm participants represent the majority of the 100+ million existing ten-digit telephone numbers, which are text enabled today.

Our goal is to provide the tools and support to evolve messaging safely while securely through the A B C's of text messaging: **A: Address** key issues, **B: Build** best practices, and **C: Create** messaging policies to guide your organization forward.

Background:

Within any growing technology, in an unregulated space, the security concerns are only discovered as the adoption grows. This initial group, is comprised of leading messaging service providers, registries, as well as industry thought leadership.

Why we are asking the FCC to step in:

The bad players have identified an opportunistic moment to take advantage of the success of the good players for their own nefarious purposes. For years this group has been integral in

protecting and representing consumer impacting issues within the text messaging space representing their individual companies to the CTIA, FCC, and FTC.

While typically in a highly competitive commercial environment, MessageComm participants are actively working together to solve these critical industry issues. Our passion is in growing into a self-governing community of competitors and ecosystem supporting organizations with a common goal, to bring stability, reliability, and most importantly security standards to end users. In addition to those who utilize or plan, using the text messaging channel while also supporting end users, expect the FCC to protect the privacy and security of their communications.

Through our association meetings, we have chosen to voice our comment on these extremely important issues. If not addressed, this will continue to affect not only end users, but also the businesses that support them.

The following are the outcomes of these discussions:

When discussing best practices for messaging amongst the group;

Validation for toll free numbers must go through the RESPORG. The RESPORG should be notified using the National Toll-Free Number database, SMS/800 ("SMS Database"). Abandoning a working, proven process defined by record of ownership held by an existing the end users involved, we all support, would be harmed.

The existing process and rules surrounding ownership to voice rights should not be dismissed. All applications that support communications for an end user on a toll free number should be treated as an extension of its voice counterpart. Within the existing toll-free voice ownership database there is an immutable record of authority supported by the National Toll-Free Number database, SMS/800 ("SMS Database"). This record provides a clear line of ownership and an expectation of an added level of integrity. End users and the industry participants all benefit from what has already existed in voice support of Toll-Free numbers for 50 years. Toll-Free is often considered the identity of the business to an end user and should be protected from those who would use a less protective process.

Without this protection, end users who expect the service to be uninterrupted are at risk for both the existing responsible organization who is the first to be contacted by the authorities when legal action is taken or is being requested via a subpoena. Without this existing documented chain of ownership, the authorities would be seriously impeded.

Suggestions:

MessageComm participants agree with the FCC ruling which defines the RESPORG as the authority which must be notified. This ensures a properly maintained chain of authority for records associated with the text enablement of a toll free number.

MessageComm suggests that the FCC extend the rights of an assigned RESPORG to have authority and protection through a valid, proven, and secure authorization process.

MessageComm participants agree with the ruling that end users have the right to manage their services provided they have a valid, authorized LOA(Letter Of Authorization).

MessageComm participants agree that text enablement of a number must have an end user if the definition of the end user can be extended to third party providers or proxies that have been assigned the authority to do so. We suggest to the FCC to further clarify the definition of an end user.

MessageComm participants agree that that the administrator for these toll free records should be required to be a neutral administrator as defined by the FCC.

MessageComm participants agree a that a third-party provider or proxy may be used in connection with the process to submit, validate, and support required functions to submit data into the National Toll-Free Number database, SMS/800 ("SMS Database")

MessageComm participants have defined the top two priorities for the health of the industry and protection of end users should be:

- Adopt security strategies to protect messaging ownership and services to end users
- Developing communications standards for more effective management of prioritized and operational standards to mitigate issues that arise within the community

With the above for mentioned, we at MessageComm implore the FCC to continue to further eradicate any distinction between consensual communication services delivered on end users toll free number(s). These include but are not limited to voice, messaging, and the future auction rights of owners. The extension of existing rights and protections have already been applied through extending existing TCPA(The Consumer Protection Act) rules without industry harm.

Thank You.

Best Regards,

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