



SOMOS™

Joel Bernstein
Vice President, Regulatory and Public Policy
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171
844-HEY-JOEL (844-439-5635)
jbernstein@somos.com

August 31, 2017

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street Lobby, Room TW-A325
Washington, D.C. 20554

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

Dear Ms. Dortch:

On April 21, 2017, the Commission released an Order¹ that authorized Somos, the Toll-Free Neutral Administrator, to open the 833 toll-free code on June 3, 2017. The order also established new pre-code opening procedures and directed Somos to poll Responsible Organizations (“Resp Orgs”) to determine mutually exclusive² 833 Toll-Free Numbers (“TFNs”). In order to assist the Commission in determining how to allocate these mutually exclusive TFNs, pursuant to paragraph 7 of the 833 Order, Somos is placing the below information gleaned during the 833 pre-code opening period on the record.

- 147 Resp Orgs participated in the pre-code opening process.
- Resp Orgs requested 72,028 TFNs in the 833 code, of which 17,638 were found to be mutually exclusive and placed in unavailable status pending FCC directive. The remaining 54,390 TFNs in the 833 code were each requested by only a single Resp Org and those numbers were assigned to the requesting Resp Orgs on June 1, 2017.
- The top 1,872 mutually exclusive TFNs were requested by 10 or more Resp Orgs.
- The top 611 mutually exclusive TFNs were requested by 20 or more Resp Orgs.
- The top 182 mutually exclusive TFNs were requested by 30 or more Resp Orgs.
- The top 100 mutually exclusive TFNs were requested by 36 or more Resp Orgs.
- The top 50 mutually exclusive TFNs were requested by 43 or more Resp Orgs.
- The top 25 mutually exclusive TFNs were requested by 48 or more Resp Orgs.
- The top 10 mutually exclusive TFNs were requested by 65 or more Resp Orgs.

¹ See, Order, *In the Matter of Toll Free Service Access Codes, Alliance for Telecommunications Industry Solutions, 800 Service Management System Number Administration Committee Petition Requesting Bureau Action to Revise Toll Free, Code Opening Methodology*, CC Docket 95-155, DA 17-382, Released April 21, 2017, (“833 Order”).

² “Mutually Exclusive” Toll-Free Numbers are those requested by two or more Resp Orgs during the pre-code opening period.

- The top 5 mutually exclusive TFNs were requested by 73 or more Resp Orgs.
- The top mutually exclusive TFN (833-333-3333) was requested by 85 Resp Orgs, or 58% of all Resp Orgs participating in the pre-code opening process.

In addition, Somos is providing the FCC with information regarding a block of 800 area code TFNs recently transferred to the Somos Help Desk. Previously assigned to Beehive Telephone, there are 9,738 numbers in the 800-629-XXXX exchange that are at the Somos Help Desk and in unavailable status. The numbers were ordered by DSMI, the previous Toll-Free Neutral Administrator, to be unavailable under the Beehive Resp Org ID in late 1998.³ To the best of our knowledge, these numbers have never been assigned an end-user customer. Somos will maintain these numbers in unavailable status until otherwise directed by the FCC.

Respectfully submitted,



Joel Bernstein

cc: Ann Stevens
Michelle Sclater
Heather Hendrickson
William Andrle

³ Fifth Report and Order, *In the Matter of Toll Free Service Access Codes*, CC Docket No. 95-155; First Report and Order, *Database Services Management, Inc. Petition for Declaratory Ruling*, NSD File No. L-99-87; First Report and Order, *Beehive Telephone Company Petition for Declaratory Ruling*, NSD File No. L-99-88, 15 FCC Rcd 11939 (2000).