

**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

REPLY COMMENTS OF CSF HOLD CO

CSF HOLD CO (“CSF”) through counsel provides its reply comments in response to the Federal Communications Commission’s (“FCC’s”) public notice in the above-referenced proceeding.

As Bandwidth notes, the status quo is holding back the industry. Due to the lack of Commission action to establish a neutral registry consistent with the Commission’s uniform past practice, CSF and others have faced on going customer disruption issues when a third-party provider deactivates an in-service toll free text (“TFT”) number. CSF and its customers experience this type of disruption on an on-going basis, and a basic review of the CSF’s customer database over the last few weeks identified the following slams:

Number	Customer	CSF Customer Enabled	“Slammed” (Involuntary Deactivation)	Reported to Registry	Reenabled
1877990XXXX	XXXXXXXXXX	1/7/18	August 2018	9/7/18	Pending
1855456XXXX	XXXXXXXXXX	11/1/17	August 2018	8/14/18	8/15/18
1888852XXXX	XXXXXXXXXX	11/2/17	August 2018	8/15/18	8/24/18
1800734XXXX	XXXXXXXXXX	11/2/17	August 2018	8/15/18	8/24/18
1888390XXXX	XXXXXXXXXX	11/2/17	August 2018	8/15/18	8/24/18

In each of the above cases, which are representative of past and continuing problems, CSF has a TFT customer in service for many months, and without customer consent, the customer's TFT text provider of choice is overwritten by a third-party, causing the customer's service to be deactivated. As demonstrated above, in some cases it has taken nine days to restore the customer's service. CSF has received no explanation for any of these (or other) slamming/overwriting incidents. This is exactly the type of problem the Commission's registry neutrality rules are designed to counter and why Commission action here is necessary.

Consistent with the foregoing and CSF's initial comments, Commission action is necessary to ensure proper use and performance of toll free messaging as a beneficial service offering. RespOrgs should be responsible for recording in the SMS Database subscriber text message enablement and messaging provider decisions. The Commission should continue and extend its rules that all number administration entities must be operated on an impartial basis according to fair neutrality criteria.

Respectfully submitted,

/s/

Michael B. Hazzard
Jones Day
51 Louisiana Ave., N.W.
Washington D.C., 20001
mhazzard@jonesday.com
(202) 879-5439

Counsel to CSF HOLD CO

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