

TollFreeNumbers.com

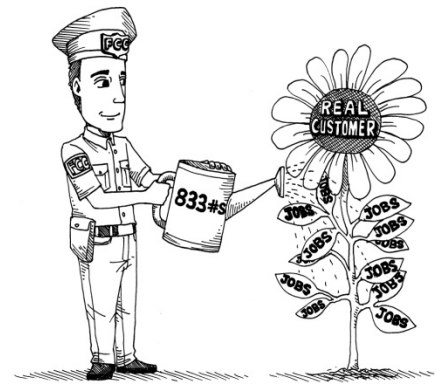
Bill Quimby, President
2517 Rt. 44, 11-222 Washington Hollow Plaza
Salt Point, NY 12578

Federal Communications Commission
Ajit Pai, Chairman
445 12th Street, SW
Washington, DC 20554
September 8, 2017

Re: 95-155 - Requesting Public Comment Period regarding the process for deciding 833 numbers set aside during the 833 Opening

Dear Chairman Pai:

First of all I want to thank Loren Stocker and his association of vanity number professionals for responding and adding some great points to the conversation. I definitely agree with three very important points Loren Stocker made and think we all have the same goal, that these high demand 833 numbers get into hands of the best real customer for each number where they will help those businesses to grow, add jobs and expand.



AN AUCTION WON'T WORK

I definitely agree that an auction should be off the table for all the reasons he discussed, as well as the fact that it goes against the grain of most FCC precedence with toll free numbers. Probably even more importantly though as I tried to point out in my 8/25/17 letter - the phone companies won't pay any significant amount of money, even for premium numbers, simply because they don't currently have in place any way to capture then bill for the end user value of certain numbers. I really can't picture AT&T or Verizon bidding on the number(s) their customers requested. The customer is the one that benefits from a good number, and they can change phone companies at any time. So the FCC ultimately isn't giving the numbers to the phone company at all, unless they are changing the roles of phone companies and customers.

SPECULATORS!



NOT ALL REQUESTS ARE EQUALLY VALID

Loren Stocker's September 1st letter made several very strong points about SPECULATION and how rampant he, and the Association of Toll Free Professionals, believes speculation is. "Speculators" and "Speculation" was mentioned 13 times. Almost twice as often as Round Robin which was mentioned 7 times in his letter, and was highlighted as one of the main issues and concerns that the FCC clearly has to address. I definitely agree with this and feel this may be the main point and the ultimate reason why *any form of Random or Rotating or whatever fancy way you want to call it* has to be *the very LAST resort*.

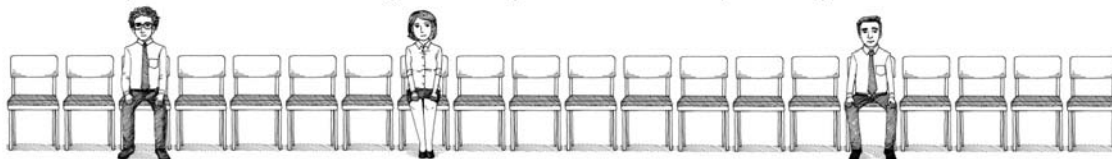
833 NUMBERS GIVEN TO SPECULATORS ARE FAR LESS LIKELY TO BE USED BY VALID END USERS

"Mass speculation," was one of the main concerns of Loren Stocker's letter. He suggested it to mean, "The best numbers are far more likely to fall into the hands of non-users, who would secure them only for resale to another party."

I've researched this quite a bit and again, I agree with Loren. Careful analysis of all the numbers taken early during the rationing periods of the 855 and 844 showed that just around 15% of those numbers are in use! More importantly, 85% were not put in use, even years later.

That's like throwing away 17 out of 20 of the best numbers! And further the ones that are used are marked up and cost the user significantly more money, which hurts the end user and ultimately everyone other than the squatter, that marks it up.

Only 3 out of 20 numbers given to "Speculators" end up used by Real Customers!



Unfortunately, this is all too true and is one of the major concerns within the industry. Part of the reason why the FCC initiated this unique new opening process, was to *get more of the good numbers into the hands of real end users and NOT the squatters.*

All of Loren Stocker's arguments about speculators are valid and demonstrate very clearly why the FCC can't simply assume that all phone company requests are equally valid and represent "real end users," without any end user information.

"ALL YOU CAN GET" IS THE STRONGEST REASON WHY CUSTOMER INFORMATION IS REQUIRED

"All you can get," is great at a buffet, but it is the epitome of what the regulations and system is designed to prevent. The fact that a respoarg administrator, let alone an association of tollfree professionals would assume that all respoargs would add 750 additional number requests just because they're "free" is more than a bit troubling.

It is also probably the best evidence why real customer information is necessary, and has to outweigh requests without any information.

The statistics recently provided by Somos also showed that more than 50% of the respoargs requested 833-333-3333. Clearly many respoargs assumed there would be some type of lottery or random blind pick.

Every one of those respoargs knew that 833-333-3333 was going to be set aside and that they probably would not secure it.



That factor alone proves there's clearly some speculation, or optimistically we can call it wishful thinking. That could have been either on the part of the customer or of the phone companies.

The bottom line is that all of Loren Stocker's arguments against Lotteries and how that incentivizes Speculation are true, and are also the best possible arguments as to why we can't just pick blindly.

SHOULD WE PICK BLINDLY OR TAKE THE BLINDFOLD OFF?



It all comes down to the fact that ***making an informed decision*** is preferable to picking blindly. Picking blindly is defined as any way of picking a request without any information about who you're giving the number to. That includes Loren Stocker's somewhat complicated R's proposal, any Lottery, or any random process that doesn't include information about the end user.

It is well known that a very high percent of requests for popular numbers clearly come from *speculators*. Therefore picking blindly, no matter what order you go in, how you weight them, or which way you spin it, is still PICKING BLINDLY. The net result will almost always mean giving valuable numbers to speculators. **IE:** 85% of the best numbers are not in the hands of businesses who could really use them to further their business growth.

The following are some of the factors that the FCC should consider (and not consider) as they evaluate the multiple requests for each number. There will clearly have to be multiple factors and levels of priority to address. For numbers in which there are no clear deciding factors it will probably be necessary to randomly pick the end user. However, that should be the very LAST RESORT.

FACTORS TO GIVE PREFERENCE FOR END USERS;

1. Those that request only 1 or 2 numbers;
2. Have registered a related domain name;
3. Have an active website on the related domain name;
4. Can show an example of their advertising;
5. Have registered trademarks relating to the term;
6. Are publicly recognized companies;
7. That use the vanity term as their brand name, or part of their name rather, than just the generic use meaning;
8. Have significant accomplishments in the industry and a track record of serving the community;
9. Have shown a real desire to clearly demonstrate their need for this number - on the record;
10. Are located or based in areas recently ravaged by the recent hurricanes;
11. Non profit or charitable organizations;
12. That have or had the same number in another area code, or locally, or toll free;
13. Where the customer's name matches the number;
14. Are *not speculators* who are hoping to resell that number for a higher cost to the real end user.



FACTORS THAT SHOULD NOT HAVE A PREFERENCE:

1. Which phone company they requested it through;
2. How many requests that phone company put in;
3. The size of the phone company that they put in their request for;
4. The speed or order in which the phone company put in the request;
5. Anything else related to the phone company.

IT'S THE CUSTOMER'S NUMBER...

This can be summed up in just 5 famous words.

"It's the customer's number stupid." Now I'm certainly not calling anyone stupid. I'm adapting the famous quote, *"It's the economy stupid,"* which James Carville coined as the campaign strategist of Bill Clinton in 1992.



It's also JOBS! It takes more effort to evaluate the customer information but, that's the only way to insure the best numbers get into the hands of the best customers that can put them to use building thousands of businesses all over the country, creating JOBS!

Trying to pick who to give the most in demand numbers of all to without knowing who the customer is, or anything about them, makes no sense at all. Unless you really don't care at all about the customers, about the system, about the industry, or the economy. The argument is *NOT* which phone company to give the numbers to, or even whether or not to Require Resubmitting Random Round Robin Rotation procedures or not. *Phone companies are already required to have a valid customer for each # they request.*

So the real question is *HOW* should the FCC allow customers to submit their information. Should they:

- A. Make it optional using the existing public comment system right here.
- B. Allow phone companies to collect and submit customer information for customers that want to submit their information to the FCC.
- C. Require phone companies to submit the customer information they are required to have.

With this in mind I respectfully request that a period of public comment to widen this discussion beyond just a few industry insiders. Thank you again Loren for your response, and I look forward to seeing you at the TF Summit in 2 weeks. And a sincere thank you to the FCC both for your consideration and for putting this much effort to innovate and improve the system.

Sincerely,

Bill Quimby

Bill Quimby
President of TollFreeNumbers.com

