

NATIONAL SECURITY CORPORATION

G. Mark Hardy, III
President

PO Box 10101, Largo FL 33773-0101 USA
gmhardy@nationalsecurity.com · +1 (410) 933-9333 · fax +1 (302) 347-6919

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Federal Communications Commission
445 12th St SW
Washington DC 20554

Re: Dockets WC 17-192, and CC 95-155

Dear Sir or Ma'am:

I am writing in response to FCC-CIRC17-09-06, Notice of Proposed Rulemaking in the matter of Toll Free Assignment Modernization and Toll Free Service Access Codes.

Your proposed rulemaking change may handicap small, disadvantaged businesses in a manner which you may not have anticipated, and I wish to explain why this may be the case, and respectfully ask you to reconsider your approach.

As the owner of a Service-Disabled Veteran-Owned Small Business (SDVOSB), I encounter significant difficulties in competing with larger, well-funded, and established companies. Although the Federal government offers some contracting preferences for a SDVOSB, those opportunities often disappear in the commercial sector.

My phone number, 410-933-9333, has been in use for well over a decade, and represents an "identity" for my company. Although it doesn't spell anything, nor is it seven repeating digits, it is sufficiently memorable that I can expect clients and prospects to remember it, increasing the likelihood I may be able to capture competitive business for my SDVOSB.

In applying for 833-933-9333 through RespOrg QZA01, I saw an opportunity to obtain a number that mirrored my local number, and would maintain the same identity. However, a single round sealed-bid Vickrey auction may not afford smaller businesses such as mine to compete effectively against larger organizations or RespOrgs that tend to keep for inventory (hoard?) the most desirable numbers for unspecified use or to resell at a mark-up, even though their cost of acquisition was zero. A Google search today for the term *toll free numbers for sale* yields about 5,610,000 results. There is clearly a secondary market, irrespective of FCC regulations, and this either drives up the cost of business for small companies, or most likely makes a toll-free number that can reflect the identity of a small business unobtainable.

Auctions may be fine for spectrum bandwidth, as participants are well-funded and the revenues for the FCC are tangible. But the nickel-dime revenue from the proposed rule change to 47 CFR 52:111 would be negligible to the Federal government, but could

easily put resources such as this number out of the reach of the American small business, adding one more obstacle to growth and creating new jobs.

Although ascertaining the benefit to the ultimate recipient of 17,000 numbers represents more one-time effort than letting large and well-funded entities essentially help themselves through a Vickrey auction, I respectfully submit that there may be more benefit to America by allowing certain entities such as a SDVOSB or other small, disadvantaged businesses to have the first opportunity for these non-renewable public resources.

A modification to reflect that preference would be in keeping with the Administration's vision for a robust, vital America, and tacitly says "thank you" to Veterans who have served honorably and now seek to continue to add value to our society through their contributions in the business world.

Thank you for your consideration.

Warm regards,

A handwritten signature in black ink, appearing to read 'G. Mark Hardy', with a stylized flourish at the end.

G. Mark Hardy
Captain, United States Navy (retired)