

But start by just charging a more appropriate fee to get phone companies used to offering better numbers.

I see five different groups here and I think all five need time to adjust, before a whole new paradigm is possible.

- Somos needs time to implement their new platform.
- Customers need time to file disputes for numbers.
- Speculators need time adjust and clean up their act.
- FCC needs time to clean up some abusers and end inappropriate practices.
- Phone companies need time to get used to offering “8-0-0” numbers and valuable vanity #s.

I think it takes a combination of cleaning up the system, and delaying the big changes a little, and incorporating system improvements possible with the new registry platform, in order to truly modernize and update the system in steps.

Somos didn't just flip a switch and turn on the new registry. It added features in stages so as not to hurt the current system and allow everyone to transition over to it. I think the FCC ultimately has to do the same thing.



Again I applaud the FCC for it's vision and want the same thing, to modernize the system and get to a more free market, value based, cleaned up and transparent system for everyone. I just think everyone has to have time to adjust and take some smaller steps. I think the FCC's goal of modernizing everything before 822 (probably in 2022) is very doable and all of these things will make a big difference for the whole industry. I look forward to being a part of it and hope this helps to open up a discussion as we work toward all of this.

Very sincerely,

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