

TollFreeNumbers.com

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

September 8, 2017

Re: WC Docket No. 17-192, CC Docket No. 95-155 – REPLY COMMENT FOR NOTICE OF PROPOSED RULE MAKING ON TOLL FREE ASSIGNMENT MODERNIZATION

Dear Chairman Pai,

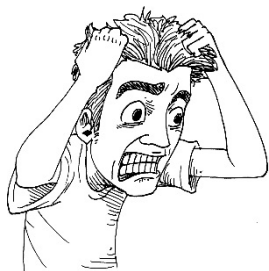
I sincerely thank you for being willing to step out and try to do a better job at allocating the 833 numbers and potentially even all toll free numbers. As Chairman Pai said in his comments, “When it comes to figuring out who should get to use a valuable public resource—like spectrum or toll free numbers—there’s a resistance to innovative ideas.”

**How to decide
833 #s Set Aside**



If this is done well it could mean the equivalent of tens of thousands of new jobs in thousands of businesses, all over North America. Unfortunately though, we’re not done yet and if you don’t complete this properly we won’t see that. I’ve been excited about this from the start and see the potential, probably more than anyone. But even the most excited customers are definitely questioning and starting to lose faith because there are simply way too many unanswered questions.

The lack of action or any answers here is definitely hurting the customers.

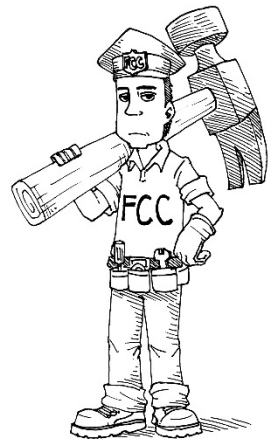


Customers are becoming more than a little frustrated with this because 6 months or more later, not only can nobody tell them how long it’s going to take, how it’s going to work, or how much it’ll cost, not to mention the fact that nothing has even been started yet. You’re making them feel like their requests didn’t matter to the FCC. They feel like you’re not caring or even trying to help their businesses.

The FCC’s auction proposal seems to assume that all 18K set aside numbers are like 833-333-3333 or 833-LAWYERS and ignores the obvious fact that over 80% of the numbers aren’t like that at all. The auction the FCC is suggesting would work for the highest demand numbers but won’t work for the low demand numbers at all. The bottom 80% won’t raise much money, and makes you look very cold and uncaring, like you’re not trying to help anyone. I don’t think that’s really the goal or the image you want to create here.

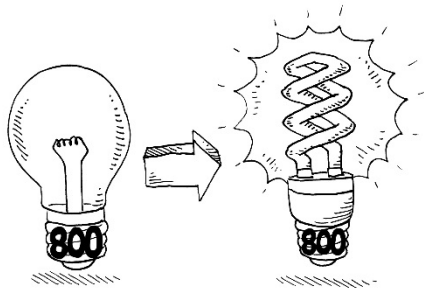
Project Creep

The best analogy I've come up with in talking to customers is that when the FCC said we'll "decide" the 833's with multiple requests later, it was like the FCC said we'll build a "DECK" after the code opening. It sounded simple enough and doable and customers assumed that meant "soon" or "shortly" after, not a year later. A few months later when people were getting frustrated and thinking they should have done or said something by now, you suddenly shocked the industry by saying, "Why don't we remodel the *whole toll free house* while we're building this 833 Deck?!"



The customers waiting for the deck feel like they're being ignored and that their requests didn't mean anything except to help you decide which numbers to now auction off. They're asking when it'll be done and how it'll work and getting absolutely no answers as the FCC tries to decide how to remodel the whole house.

Don't mix the two issues



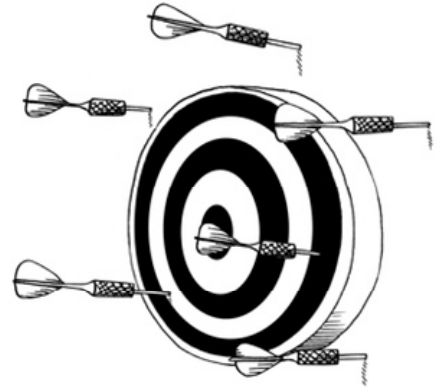
So, before I get into either part of this in detail, I want to separate the set-aside 833 "Deck" project, from modernizing (aka "remodeling") the whole toll free house. Because you can build a deck without remodeling the whole house and you can remodel the house no matter what you do for the deck. And it's wrong to hold up all the customers waiting on the deck, just like it's wrong to rush into remodeling the whole house just because you are late with the deck.

The two projects are similar in some ways but certainly not technically connected. It's bad enough expecting the government to build a deck. Linking and mixing the two separate projects will only hurt the customers that have a right to expect answers and action on the deck. So, I'll write a separate letter about modernizing the whole house and focus this letter, just on the 833 deck numbers everyone is still waiting anxiously for.



Let's start by focusing on the objectives

When a project grows and things become more complicated I find it's best to start by clarifying the objectives, because when you define clear objectives you're much more likely to accomplish them. I don't think our objective is to just give out or get rid of the best 833 numbers at random, because if we didn't care who got them and wanted to do that, we could have easily already done that this past summer.



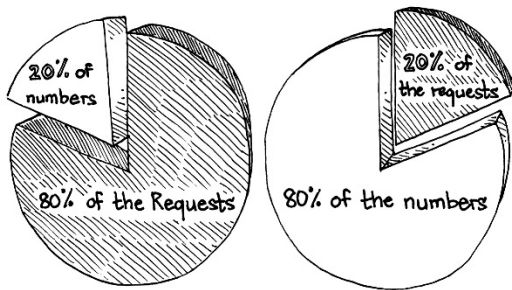
I think the ultimate objective in this, is to get the in-demand numbers to the BEST CUSTOMER for each number. Best customer, being defined as where it'll do the most good. Where it will be used the most and where it will benefit a real customer's business the most and/or benefit the country, the industry and economy, and in some cases where users expect it to be.

The most obvious implication of that simple objective is that good numbers wherever possible, should go to "real" end users, that want or need that particular number to build their business rather than speculators which may or may not actually end up using it. If it matches a customer's company name, their brand, their domain name, and/or registered trademarks, that company should be given preference (ie. 833-MICROSOFT should be given to Microsoft Inc rather than a squatter, likewise 833-REDCROSS should be given to the Red Cross not a speculator).

I do NOT think the main objective of the FCC in doing this is raising money since this applies to customers throughout North America and the US government wouldn't have a real claim to it. Reducing the cost of administering the numbering system won't save the government anything. It also wouldn't directly lower the tariffed fees that phone companies pay. So it's hard to say anyone would benefit from or need the funds.

The two different types of Set Aside Numbers and the 80/20 rule

The 80/20 Rule



Before we talk about how requests should be decided we have to understand that there are TWO different types of set aside 833 numbers. The FCC discussed the extreme high demand numbers but acted like they were indicative of all the set aside numbers and in reality, they are anything but indicative. They are the exception.

That's kind of like saying the two most expensive homes in a community valued at ten million dollars each, are indicative of all the homes in that community, or saying the two people making millions a year at the

top of an organization are representative of the entire organization when most are lucky to make 50-100K. 80% of the 833 requests only had two or three requests when there was no additional fee at all, and one of those has probably lost interest after 6 months. The 80/20 rule clearly applies here.

The TOP 20%

An auction would work for the highest in demand numbers but requires a significant amount of interest. These high demand numbers may represent the 80% of the requests. But the bottom 80% of the set aside numbers which represent only 20% of the requests and they do NOT have enough interest for an auction.



What to do for the other 80%

You would have a hard time judging what customer request is best for the high demand numbers that had 50-100 requests so an auction makes sense for them. But the bottom 80% of the set aside numbers wouldn't generate *anything* in an auction and you'll be lucky if you get back even two completed surveys for the low demand numbers. These lower demand numbers are much more manageable manually and should be judged

New top level domain names usually allow trademark owners to have first crack at their matching domain names because it's in the public's and the industry's best interest. Not to mention that the goal of any allocation system has to be to give each in demand number to the best customer, that will grow their business and create jobs. You have the ability to create tens of thousands of new jobs worth of grown in thousands of small businesses all over North America.



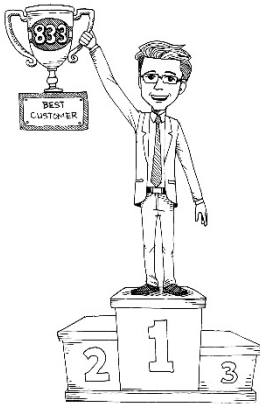


That's why I'm going to propose that the FCC require the customer information for each set aside number. Every respoarg is required to have a customer for each request so it's easy to request or require this info in order to evaluate who is the best customer for each number. Trying to pick the best customer without the customer information is like trying to build a deck with your eyes closed. The FCC should commission an independent contractor to conduct a simple 10 to 20 question survey designed to measure the factors which should be used to evaluate the need for each organization of that number.

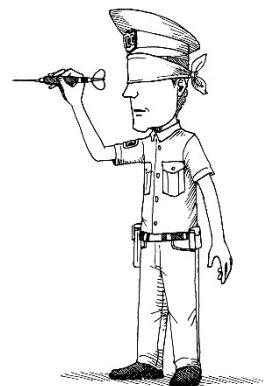
I've attached a sample questionnaire. This could be done on just the 20% of the requests for the 80% low demand numbers. The results would be analyzed by the contractor and given a score. Then the FCC could just give the number to the requestor for each number with the highest score.

Real Customers should be the Priority

While it would be hard to decide between 50 requests for a number, deciding which customer is best for the low demand numbers is doable and wouldn't be any harder than an auction. It would be easy enough to tell which customers are real and which ones are just speculators with just a few questions. Based on what I've seen, I believe a fairly high percentage, are from speculators and between those and the customers that lost interest, probably half or more wouldn't even complete a questionnaire.

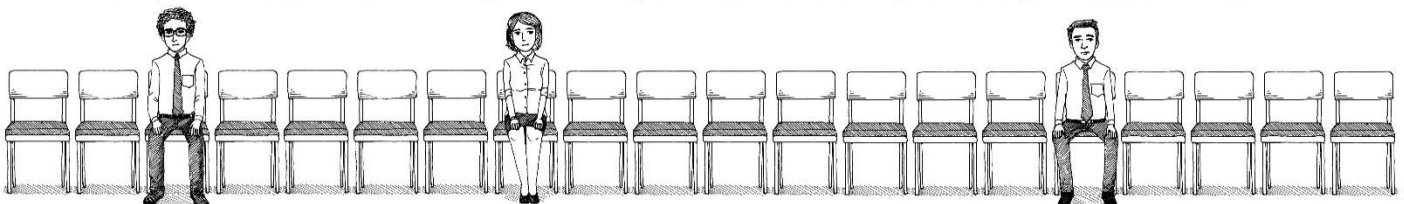


So deciding the low demand 80% numbers would actually be much easier than you might expect. If the scores were close and there was no clear choice picking at random from real customers would still be better than picking at random without knowing if they're real or even still interested.



A questionnaire wouldn't cost that much and could be paid for by the proceeds from the auction of just a couple of the high demand 833 numbers or a small fee for the low-level numbers. If all it did was insure that the numbers requested went to actual

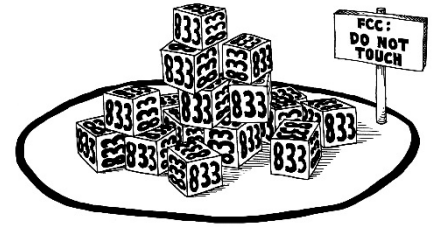
Only 3 out of 20 numbers given to "Speculators" end up used by Real Customers!



customers that had a reasonable need, and not to brokers that would insure that 85% more would be put into use since traditionally 85% of the numbers with brokers don't get used by end users.

Set Asides that should be Set Aside

There are some numbers that people have suggested should be set aside for special use. Commissioner Jessica Rosenworcel's comments referenced 1-800 SUICIDE which is a good example of numbers that have in the past been given directly to specific organizations. Another example is 1-800-RED-CROSS. The ultimate goal here is to put valuable numbers to their best use for the society. That's why it would probably be wrong for that to go to someone other than the actual Red Cross and it's wrong to auction it off to anyone that wants it. It's also wrong to auction off 833-MICROSOFT which is on the list, to just anyone too.



"Another proposal would set aside toll free numbers to promote health and safety for use by non-profits and government, without cost."

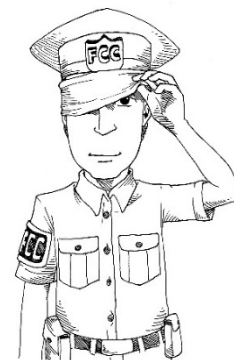
I've made a list of 40 of the 833 numbers from that I believe should be set aside for government and non-profit. This is one area that needs additional input though so review the list and there may be a lot more numbers that could be added, but here's what I came up with to start with:

833-4325842	HEALTHCARE	833-4877422	HURRICANE
833-2445373	CHILDREN	833-8676236	TORNADO
833-3382284	EDUCATION	833-3473273	DISEASE
833-7883368	STUDENT	833-4224828	HABITAT
833-4677482	HOSPITAL	833-3475662	DIPLOMA
833-3333725	FEDERAL	833-8474867	VISITOR
833-8648337	UNITED STATES	833-6334224	MEDICAID
833-4687464	HOUSING	833-3425626	FHA LOANS
833-4683766	GOVERNMENT	833-8648336	UNITED NATIONS
833-7329253	RECYCLE	833-2664737	CONGRESS
833-8732787	TREASURY	833-7624257	SOCIAL SECURITY
833-3266669	ECONOMY	833-8256267	VA LOANS
833-2667378	CONSERVE	833-7655884	POLLUTION
833-7654842	POLITICS	833-2277328	CARSEAT
833-4325847	HEALTH PLANS	833-2472676	AIR BORN
833-3673787	FORESTRY	833-3622779	EMBASSY
833-4478674	HISTORIC	833-2532624	CLEAN AIR
833-9453543	WILDLIFE	833-2583276	BLUE CROSS
833-8658683	VOLUNTEER	833-7225626	SBA LOAN
833-4444929	HIGHWAY	833-7338637	REFUNDS
833-7842433	SUICIDE	833-7332767	REDCROSS

In order to determine which numbers might need to be set aside you have to know what the numbers you're dealing with spell, which brings us to the next point.

We have to KNOW what we're dealing with

The more important first step in evaluating the numbers and which ones should be set aside for a specific purpose, use or organization is to figure out what they spell. It's impossible to determine which ones should be set aside or who would be the best customer for numbers or even maximize the interest at an auction, without knowing what the best use of the numbers are.



Auctioning off numbers without knowing what they spell is like auctioning off cars by the vin number without even letting people know what type of car it actually is, or with car covers on them. Sure the customers could figure out what type of car it is from the VIN number or from the shape if they worked at it, but most prospects for a number aren't going to go to all that effort, nor should they have to.

Not to mention the fact that, it doesn't save you anything not to show the vanity use. This might be ok for the industry insiders that know how to figure out the numbers vanity spelling and its value, if you were only selling to car dealers, but you clearly can't maximize the value or know who's the best customer for a number without this information.

That's why I've attached a spreadsheet (csv) with the set aside numbers and their vanity translations, in order from the overall most valuable to the least valuable (by combined vanity and numeric value) according to my patent pending valuation system.

I don't know why nobody else has responded to this NPRM yet. Maybe they will at the last moment or if they see someone else responding. Hopefully this helps to get the ball rolling and more people are willing to respond to this.

Summary

I agree that an auction would be an efficient way to allow the customers to prioritize themselves for the top 20% high demand numbers that account for 80% of the requests. But I don't think that would work as well for the lower 80% numbers that only have 20% of the requests.

A customer survey asking about matching trademarks, domain names, company names, how much advertising they do, how long they've been in business, and how many 833 numbers or other toll free numbers they have wouldn't work well if there are hundreds of requestors but would be a better way to decide which customers are best for most of the numbers! They're two very different situations.

As I said in my two previous letters about this, it seems so obvious, but you can't decide who the best customer for each number is without knowing who the customer. You can't expect the prospects to know how much a vanity number is worth without knowing what it spells. So I've given you part of the puzzle by giving you the vanity number spellings. The phone companies can give you the customer information, and customers would give you the answers you need to make best decisions here.



Whether you do it as an auction or use a survey, it takes some work and effort to "decide" who the best customer is for each number. But each of those numbers you decide and get to a real business that needs it means JOBS!! Doing this right will mean tens of thousands of new jobs worth of growth in thousands of businesses all across North America.

Phone companies seem concerned about what's easiest for them. Speculators are going to argue for what gives them the most numbers. The voice that seems to get lost in this process is often the customer's. The FCC is really the only one that's supposed to be putting the customers' needs first. So please do what you have to, to get these great numbers to the best real customers possible. Don't let them get sucked up by speculators and don't drag this out another six months and try to build this deck with your eyes closed, or you'll continue to lose customers and hurt the industry.

Very sincerely,

Bill Quimby

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1-800 MARKETER
President of TollFreeNumbers.com

