

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Toll Free Assignment Modification	)	WC Docket No. 17-192
	)	
Toll Free Service Access Codes	)	CC Docket No. 95-155

**COMMENTS OF RINGBOOST.COM**

As the Vice-President of RingBoost.com, I am writing in support of the Federal Communications Commission ("FCC") changing its rules to allow for the selling of toll free numbers. I believe, based upon extensive business and industry experience, that modification of the toll free rules is in the best interest of consumers and small businesses throughout the U.S.

The FCC, in paragraph 31 of its Notice of Proposed Rulemaking, recognizes that "Current market realities appear to support a secondary market as an efficient and productive use of numbers." Further, the current restrictions on a business selling numbers assigned to it actually impede the public good by requiring numbers to be returned to the "pool" rather than being transferred to the buying business which can utilize those numbers in the operations of the purchased business. As the FCC itself recognizes, "For example, in a secondary market, a business owner who wants to sell his or her business may sell the right to use the toll free number associated with the business. This reassignment would benefit both the seller and buyer of the business. Therefore, a secondary market may be more equitable and promote economic efficiencies as the number would be better utilized by the new business owner than if it were returned to the pool of available toll free numbers and subject to first-come, first served assignment." (Notice of Proposed Rulemaking, para. 30).

Ringboost™ agrees with the FCC on these important points. As background, RingBoost™ has promoted and been supportive of the expanded use of toll free telephone numbers for over 10 years and has made substantial investments in technology and marketing over that period. RingBoost™ is the owner of record of such known brands as 1-800-HOMECARE™, 1-800-HOSPICE™, 1-800-CABLE-TV™, 1-800-HURT-NOW™ and 1-877-WINDOWS™ and has helped promote the equitable distribution of such brands through the use of shared use technology. One of the premises and original arguments against the free trade of toll free numbers was that they are a "scarce resource" and that private companies would scoop them up and prevent small and medium sized businesses from having access to them. Contrary to that thinking, RingBoost™ and many similar companies have actually broadened the use of toll free numbers and made these numbers more available and accessible to small businesses that otherwise would never had had access to great vanity numbers and toll free numbers in general. For example, instead of 1-800-HOMECARE™ being locked up by one company in one market, 1-800-HOMECARE™ is actually being used by many different companies in more than 20 different markets across the United States on a shared use basis. By way of another example, RingBoost™ enables close to 1000+ companies around the country to utilize, through sharing arrangements, approximately 100 toll free numbers, thereby giving small and medium-sized

businesses access to popular toll free numbers they would not have been able to access. Thus, through technology and marketing innovations and commitment to toll free number usage, companies like Ringboost™ have actually conserved numbers and enabled broader use by small and medium-sized businesses.

The problem with the current twenty-year old FCC rules prohibiting the sale of toll free numbers is that investing in and building this shared use model, which promotes toll free usage by more small companies and toll free usage in general (and actually conserves numbers), is that RingBoost™ and others like our company are at a clear competitive disadvantage to digital companies like, for example, fictional “4homecare.com”. Digital companies like 4homecare.com can build their businesses with the knowledge that they can freely sell their companies one day or have a different exit strategy because internet domains can easily be bought and sold without restrictions. The free trade of domains also allows digital companies to attract investors and financial institution support. However, in contrast, under current FCC rules, RingBoost™ cannot sell its business units or its parent company because numbers cannot be sold or brokered, and a buyer would want access to RingBoost™ assigned numbers, in addition to its technology. Investors and banks also face the uncertainty of investing/loaning to a business that cannot transfer toll free numbers as part of a going concern. Being at a competitive disadvantage to digital companies that build their business around URLs that can be freely sold, brokered and transferred is causing companies like ours to exit the business and not promote the use of toll free numbers, which will have a very negative effect on the use of toll free numbers in general (particularly by small and medium-sized businesses) and the use of great vanity numbers that keep toll free numbers in the public eye.

In closing, the FCC’s toll free rules are outdated and fail to reflect modern economies. We live in an age where digital and online marketing have changed the dynamics of the broad use of toll free numbers. Companies like RingBoost™ are bucking that trend by promoting and expanding the use of toll free numbers and toll free brands. However, without relief from the FCC on the business side of the free trade of toll free numbers, companies like ours will one day discontinue operations. Thus, an innovative approach to actually conserving toll free numbers while also enabling more small and medium sized businesses to use those numbers, will cease to exist. The FCC asks, in its Notice of Proposed Rulemaking, “whether the brokering rule was a useful way to achieve” the end goal of “equitably assigning numbers and minimizing number exhaust.” (Notice of Proposed Rulemaking, para. 36). The answer, in 2017, is no. RingBoost™ supports the revocation of the brokering rule as current market realities reflect that market participants can, through innovative technologies such as Ringboost™ minimize number exhaustion and promote toll free usage by businesses of all sizes. The prohibition on selling numbers (as part of a business sale or otherwise) is outdated and should be revoked in favor of a free market approach that encourages toll free subscribers to innovate in the public interest and in furtherance of economic efficiencies.

Respectfully submitted,

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