

Before the
Federal Communications Commission
Washington, DC 20554

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

COMMENTS OF THE COALITION OF CANADIAN RESPORGS

TELUS Communications Inc., Allstream Business Inc., Bell Canada, Distributel Communications Limited, Fibernetics Corporation, Iristel Inc., ISP Telecom Inc., Navigata Communications Limited, Rogers Communications Canada Inc., and Quebecor Media Inc. (on behalf of Videotron G.P.), (collectively, the “Canadian RespOrgs”), respectfully submit these comments to the Federal Communications Commission (the “FCC”) in the above-captioned notice of proposed rulemaking proceeding (the “Notice”).

The Canadian RespOrgs are telecommunications service providers registered with the Canadian Radio-television and Telecommunications Commission (“CRTC”). The Canadian RespOrgs are all toll-free service providers and responsible organizations (“RespOrgs”)¹ and have a commercial interest in access to and the equitable distribution

¹ A “RespOrg” is a company which maintains the registration for individual toll-free telephone numbers in the toll-free Service Management System.

of toll-free numbers in the North American Numbering Plan (NANP). The Canadian RespOrgs promote and distribute toll-free² numbers throughout Canada.

Due to the high demand for certain distinctive toll-free numbers, the FCC proposes to break from the traditional "first-come, first-served" method of distributing toll-free numbers and instead make access to these specific numbers available only through an open auction process.³ This would apply immediately to the distinctive numbers within NPA 833 that are currently unassignable and possibly to assignments within future code openings.⁴ While the Canadian RespOrgs recognize the FCC's interest in ensuring "the continued usefulness and availability of this finite resource,"⁵ nevertheless, any change from the traditional distribution process must provide direct and proportional benefits to current participants.

The Canadian RespOrgs support the FCC's recommendation that the proceeds of any toll-free number auction be used to offset the costs of toll-free number administration. Specifically, the Canadian RespOrgs recommend that auction proceeds directly offset the monthly fees for toll-free numbers paid by all RespOrgs.⁶ This will yield a benefit to individual RespOrgs which is proportional to the number of toll-free numbers they administer. Consumers directly benefit from the use of toll-free numbers and reducing the input costs proportionally across RespOrgs will benefit all participants at their level of

² In addition to NPA 833, the Canadian RespOrgs currently distribute toll-free numbers in the following NPAs: 800, 844, 855, 866, 877, and 888.

³ *In the Matter of Toll Free Assignment Modernization*, WC Docket No. 17-192, *Toll Free Access Codes* CC Docket No. 95-155, *Notice of Proposed Rulemaking*, FCC 17-124 (rel. Sep. 28, 2017) ("*Toll-Free Auction NPRM*").

⁴ *Toll-Free Auction NPRM* at ¶6.

⁵ *Id.*, at ¶1.

⁶ The current cost of a toll-free number is \$.1094/number/month. Canadian RespOrgs maintain hundreds of thousands of toll-free numbers, incurring tens of thousands of dollars in monthly costs.

participation, thereby not distorting the toll-free market. The method proposed by the FCC is an efficient and effective mechanism for achieving that goal.

In addition, should auction proceeds exceed the yearly costs of toll-free administration, the Canadian RespOrgs recommend that excess funds be used to defray the costs of toll-free administration in subsequent years. Consistent with the experience in Australia,⁷ the Canadian RespOrgs expect that auction revenues will decline over time after the most popular numbers have been awarded. Thus any surplus would be temporary and would not create an administrative burden to roll-over from year to year.

Lastly, though the FCC recognized that NPA 833 is a resource shared among 20 countries in the NANP,⁸ the Canadian RespOrgs request that the FCC clearly state that Canadians have an equal opportunity to bid on the toll-free numbers in question. Canadian RespOrgs and organizations rely heavily on toll-free numbers and should not be put at a disadvantage with respect to their American counterparts.

Respectfully submitted,

The Coalition of Canadian RespOrgs

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⁷ *Toll-Free Auction NPRM* at ¶11, (citing Austl. Commc'ns & Media Auth., *Telecommunications Performance Report* 2004-05 at 201-02 (Nov. 17, 2005), <https://www.accc.gov.au/system/files/37%20-%20ACMA%20Telco%20Performance%20Report%202004-05.pdf>).

⁸ *Toll-Free Auction NPRM* at ¶27.

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