

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Toll Free Service Access Codes)	CC Docket No. 95-155
)	
Implementation of the Telecommunications Act)	CC Docket No. 96-115
Of 1996, Telecommunications Carriers' Use of)	
Customer Proprietary Information and Other)	
Customer Information)	
 Petition of 800 Response for Declaratory Relief)	
Or Further Rulemaking)	
 To: The Commission		

FURTHER REPLY COMMENTS OF
800 RESPONSE INFORMATION SERVICES LLC

800 Response Information Services LLC ("800 Response") hereby requests the Commission permit the filing of these further reply comments to respond to incorrect statements in the Reply Comments of Competitive Carriers Association, filed on December 3, 2018 ("CCA Reply"). By choosing not to submit initial comments and filing their Reply Comments on the last day for submission, CCA foreclosed 800 Response's ability to respond within the allotted timeframe for reply comments.

CCA states that "800 Response provides toll-free services that use data from location-based service ("LBS") providers." [Reply Comments, page 2]. This is not true. 800 Response obtains coarse data on the location of wireless callers dialing our customers' tollfree numbers from a company that contracts with wireless telecommunications carriers to serve as an intermediary between the wireless carriers and the consumers of location information. The latter include both

interconnecting telecommunications providers such as 800 Response and LBS providers. The location information aggregators efficiently transfer location information from the wireless carriers to potentially hundreds of toll free providers and thousands of LBS providers.¹

Further, CCA states that “telecommunications carriers will always connect customer calls to 800 numbers.” [CCA Reply, page 2.], implying that merely connecting a call satisfies a carrier’s obligations, regardless of whether the call is connected to the termination point designated by the toll-free service subscriber or, in the case of Shared Use toll-free numbers, whether the call is even connected to the correct subscriber.² The statutory obligation to interconnect with other carriers, however, can only be rationally interpreted as requiring the provision to the

¹ 800 Response, like other telecommunications carriers, uses such location information solely for the purpose of fulfilling its statutory obligation to interconnect with the wireless carriers and correctly route the tollfree calls which those wireless carriers send it. LBS providers seek to profit from the location information through its monetization.

² Shared Use is an acceptable use of tollfree numbers, embodied in the ATIS Industry Guidelines for Toll Free Number Administration since the first edition was issued almost 30 years ago.

interconnection carrier of the information required to route calls to the *correct* subscriber when such information is readily available.

Respectfully submitted,

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