



Telecom BPO Services
&
Independent Toll Free RespOrg

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TO: Federal Communications Commission

Re: Text Enabled Toll Free

ATL is the largest independent (not affiliated with a carrier) RespOrg. We find it very concerning that one particular provider of texting services for Toll-Free Numbers can text-enable a Toll-Free Number without the knowledge of the RespOrg or the customer.

This lack of authorization was experienced first-hand when a major customer asked me if it was possible to activate texts on their very well-known Toll-Free Number without their permission and knowledge. I was quickly able to do so on this provider's platform and could have intercepted the texts immediately.

This is the problem that the Somos Texting and Smart Services (TSS) Registry is intended to fix. Service providers that use the TSS Registry are notifying Resp Orgs that a Toll-Free number has been text-enabled. Service providers that bypass the TSS Registry, by contrast, threaten the value and viability of Toll-Free numbers. This harms subscribers and will lead to consumer's being deceived by thinking they are texting one company and are, indeed, sending their texts elsewhere. In addition, only numbers that are in service for voice can be text-enabled through the TSS Registry, as per CTIA guidelines.

Intercepting Toll-Free texts without the knowledge and permission of the customer of record is outrageous.

ATL believes that this problem should be fixed immediately. SOMOS currently manages the Toll-Free Number registry and the TSS Registry. Somos, as an independent third-party and the Toll-Free Neutral Administrator, is the only registry operator we would trust to provide the authorization database.

Warmly

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