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February 25, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Room TW-B204  
Washington, D.C. 20554

Re: Notice of *Ex Parte* Meeting: WT Docket No. 08-7, Petition of Twilio Inc. for an Expedited Declaratory Ruling Stating That Messaging Services Are Title II Services

Dear Ms. Dortch:

On February 23, 2016, Alan Stiffler (Somos, Inc.), Ryan Karnas (Somos) and the undersigned met with Pramesh Jobanputra, Michael Janson, Matthew Warner, Jennifer Salhus, and Karen Sprung of the Wireless Telecommunications Bureau, and Ann Stevens, Marilyn Jones, Sanford Williams (by phone) and Michelle Slater (by phone) of the Wireline Competition Bureau to provide an update on texting to Toll-Free Numbers and Somos's filing in the above captioned proceeding.

Attached to this filing is the presentation Somos provided. We discussed how Toll-Free is a unique ecosystem within the telecommunications industry and the role Somos fills as the FCC-appointed Toll-Free Neutral Administrator and the provider of the SMS/800 platform for reserving and routing Toll-Free Numbers.

We also discussed the Texting and Smart Services Registry that Somos has created and deployed for the purpose of text-enabling Toll-Free Numbers, and for future other services provided via Toll-Free Numbers. We provided a live demonstration of the TSS Registry, showing how the registry works from both the Responsible Organization (Resp Org) and the texting Service Registrar perspective.

We discussed the current ecosystem and showed how Toll-Free Numbers can be text-enabled without the knowledge of the Resp Org or its Toll-Free subscriber. This has the potential for significant harm such as consumer fraud, loss of business reputation, damage to the integrity of the Toll-Free system, and potential issues arising under the Communications Assistance for Law Enforcement Act (CALEA).

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,



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