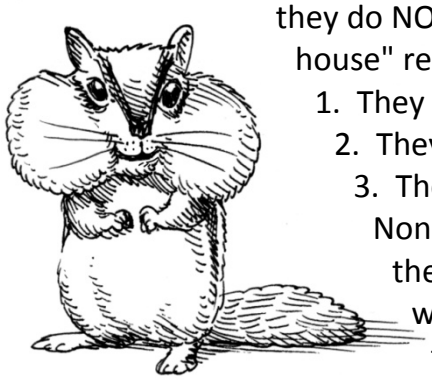
Federal Communications Commission
Marlene H. Dortch, Secretary of the FCC

Re: WC Docket No. 95-155 - Comments regarding the 833 Release

Dear Ms. Dortch

On Aug. 1st 2010, I wrote a letter to Sharon Gillett at the FCC, requesting something that had never been done before, to improve the 855 release. I requested that they ration 855 numbers during the first few days of their release to prevent a handful of "industry insiders" from sucking up the vast majority of the new 855 numbers. To the FCC's credit and the benefit of the public and the entire toll free industry, they did just that and it has helped insure a more equitable distribution of the new numbers during the last two releases.

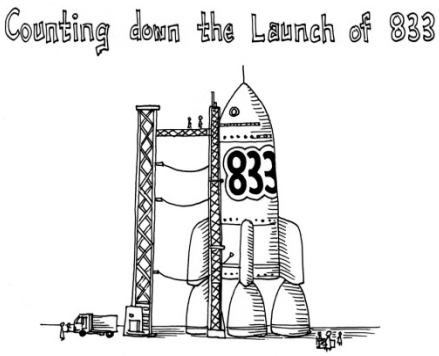


Rationing is clearly still required today because like it or not there are some "in house" resporgs that may try to look like regular phone companies, but they do NOT have traditional customers or business models. These "in house" resporgs have 3 advantages over traditional resporgs.

1. They know the most valuable #s.
2. They don't have to wait for customers to request #s.
3. They get to keep the value of any #s they suck up.

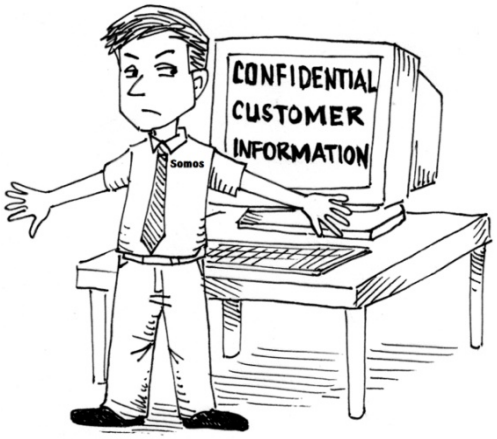
None of these things are true for traditional phone companies so they have no financial incentive or need to be able to compete with the "in house" resporgs that race to suck up numbers as they become available.

This brings us to why I think it's necessary to make a couple simple tweaks, before the launch of 833. The FCC is looking for input here but they're missing the most important input of all, input from the actual end users. Almost no regular toll free customer is going to contact the FCC and there's no real mechanism to measure their satisfaction or desire for this new area code.

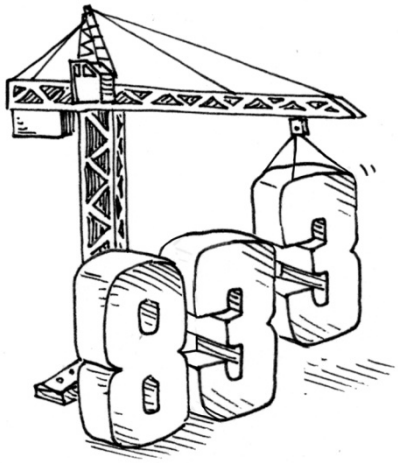


Therefore I believe it's clearly time to require any resporgs reserving or activating 833 numbers during the rationing period to submit the customer name, address, phone, email, company name and account number in a secure manner to a designated contact at Somos. They must also affirm that this is the actual end user of record of the number. This would only be temporary while the first come first serve process is lifted, and will serve two major purposes.

Somos would be instructed to keep this end user information completely confidential but should do a simple validation process and then do a two part survey. They should do an immediate survey of customer satisfaction, the number of numbers the customer requested and received, their satisfaction with the process and their resporg, the general nature of their business and whether the number is active and ringing through yet or not. Somos could also be directed to dial the number at some point as well, or in all cases depending on the responses or lack of responses. Then they would also do a long term follow up and ask about consumer desire for the next release at an appropriate time. The resporgs with the highest and lowest satisfaction rates could also be made public.



This will give Somos the FCC and even the public, invaluable feedback about the customer satisfaction with the process and help to answer many of the questions they are currently asking. It would also insure that the majority of the best numbers go to actual end users and not get sucked up by industry insiders. The FCC has regulations against hoarding and brokering but are only able to enforce after the fact. This would allow them to actually PREVENT hoarding BEFORE it happens rather than facing the expensive and difficult and sometimes impossible process of trying to address it after the fact. Both of these benefits are extremely valuable to the FCC, the public and the industry as a whole.



Every phone company already has this information available. Somos also has access to the resporg records and have clearly proven themselves independent and trustworthy with customer data. So I don't think them keeping a limited amount of customer data secure is much

of an issue. My only concern in suggesting this is that the FCC might decide it likes getting this information a little too much.

Just like suspending first come first served is only appropriate during this unique rush, I do NOT think it's appropriate to change the regular process all activations. Adding this extra step to just this 1% of the numbers being taken during the rationing gives us most of the benefit of feedback and hoarding prevention we would get if we did it for every activation without the additional work or changing the whole process.

I think it's also time for SOMOS to provide some additional information as well. They need to offer a list of the 833 numbers that were taken each day that afternoon or evening to all resporgs. It should be readily available without the ridiculous requirements of the regular month end process through Unisys, (which can literally take days to work and very few organizations are prepared for). This would allow phone companies to check the status of their current and pending requests without having to check them all one at a time. It would minimize the amount of requests for numbers that are already taken and allow the resporgs to manage their requests and notify customers better and ultimately provide better service to their customers.

All of this would only be for 833 numbers and only during the rationing period and wouldn't change the regular process. This would only be in effect while the first come first served, "open" process is suspended. This would give the opportunity for the FCC to monitor and evaluate everyone's activity in a way that it never had before, at the same time allowing phone companies to do a better job for their customers as well during this critical time.

Better communication and information both ways will clearly improve the process, and I really believe there is no other simple tweak to the initial release process that can improve the end users chances of getting valuable numbers that they are asking for and will help their business like this small change does.

It'll provide valuable information and insight into the real customer's needs more than 100 industry meetings would.

Since I'm already making people that have learned to take advantage of the system hate me, I'll throw out one more obvious change that I can't believe nobody has done yet. We've been rationing numbers by resporg for two releases now as if each organization only had one resporg. However that's clearly NOT the case. The organizations attempting to suck up numbers aren't dumb and have simply spawned multiple respor gs.

Therefore I'm also going to suggest that any respor gs owned or set up by the same company or parent company, at the same address, or with the same contacts should be assumed to be ONE organization and receive ONE ration. Also no new respor gs that are less than a year old should be given a separate ration. Any appeals to this assumption or new resporg restriction would have to be made IN PERSON at the November Somos conference. It's time to be more transparent and reduce the incentive to game the system.

This is the information age and not to have any follow up or communication of any kind with the most important people we're here to serve seems almost archaic, and it's time for us to make this a more open and transparent process for everyone.

Very Sincerely,

Bill Quimby
Founder and President of TollFreeNumbers.com