

Before the:

Federal Communications Commission Washington, D.C. 20554

Marlene H. Dortch

Office of the Secretary

In the Matter of)

ATIS/SNAC Petition re Toll-Free)

Code Opening Methodology)

CC Docket No. 95-155

COMMENTS OF THE TOLL FREE NUMBER COALITION

Ms. Dortch:

These Reply Comments are submitted on behalf of the Toll Free Number Coalition (“The Coalition”) in response to the *Public Notice* released May 4, 2016, in the above-referenced docket. In the *Public Notice*, the Federal Communications Commission (Commission) seeks input on a *Petition Requesting Bureau Action to Revise Toll Free Code Opening Methodology* submitted by The Alliance For Telecommunications Industry Solutions 800 Service Management System Number Administration (“ATIS SNAC”). The Coalition supports this petition and urges the Commission to adopt each of the recommendations put forth in the ATIS SNAC Petition.

The Coalition has filed comments with respect to the two most recent (855 and 844) toll free code openings. In those filings, the Coalition has expressed concern with the methodology to be used with respect to those code openings, arguing that a fair, orderly, and efficient code opening could not be accomplished without employing specific methods, which were clearly outlined in our petitions.

The Coalition is pleased to fully support the recommendations put forward by ATIS SNAC for the opening of 833 and future codes. The process employed by ATIS SNAC in arriving at the recommendations was methodical and comprehensive, including:

1. Identifying and reviewing procedures followed for the most recent code openings
2. Identifying alternative procedures that would result in code openings that are more efficient and fair
3. Providing an analysis of pros and cons for each proposed change in code opening procedures
4. Determining which proposals had the support of ATIS SNAC, and
5. Providing information to the entire Responsible Organization (“Resp Org”) community in order to solicit a broad degree of input and comment.

A survey was then sent to all Resp Orgs to determine the level of industry support for 1) restricting reservations from a new code to 100 numbers per day during the initial 20 days of a code release, and 2) limiting affiliated Resp Org groups to a single 100 number daily limit on reservations in aggregate. Approximately 20% of the 380 unaffiliated Resp Orgs responded to the survey. Of these 76 respondents, 89% supported the limit of 100 number reservations per day, while 78% supported imposing the 100 number daily limit for the first 20 days.

Furthermore, the Coalition applauds Somos, Inc. for its support of the ATIS SNAC recommendations, as well as for its foresight and advance preparation for implementing those recommendations, including the recommendation to recognize multiple related Resp Orgs as a single entity for the purpose of allocating newly released numbers during the first twenty days of a code opening.

Given the consensus agreement among ATIS SNAC member companies and the strong support evidenced by the results of the industry-wide survey and the Somos Comments, the Toll Free Number Coalition urges the Commission to issue an order for the release of 833 and future Toll Free codes consistent with the recommendations set forth in the ATIS SNAC petition

Respectfully submitted,



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