

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Comments on Petition of Alliance for Telecom.	)	
Industry Solutions 800 Service Management	)	
System Number Administration Committee	)	CC Docket No. 95-155
Requesting Bureau Action to Revise Toll-Free Code	)	
Opening Methodology	)	

**COMMENTS OF TOLLFREENUMBERS.COM.**

I wanted to reply and clarify my comments regarding the opening of the 833 area code dated June 1st, 2016. I was NOT suggesting a manual follow up with the tens of thousands of end users set up during the rationing period of the 833 release. I was suggesting an automated email survey be sent to the end users of toll free numbers set up during these 20 days. One survey sent shortly after the close of the rationing period and another longer term one to measure the desire for another area code. Somos has used this type of email survey repeatedly for a number of things. It's become standard procedure and every company uses them for even the smallest transaction or interaction today. The volume of recipients really doesn't matter much or make it very much harder.

Somos expressed some concern about it being legally spam since the end users are not customers of Somos. I think the answer for that is simple. As part of the process just have each RespOrg sign an affidavit detailing any affiliated RespOrgs AND that they will inform every customer that they will receive a survey about the process from Somos. If the RespOrg informing the customers about this isn't enough, an order from the FCC is probably sufficient. Not to mention that the public has come to expect satisfaction surveys today.

I also want to point out that regardless of whether any survey process is even done at all, simply requiring this additional information on these numbers, will benefit both the consumer and the FCC. This transparency will benefit the consumer by discouraging and reducing any potential hoarding when it's most likely to happen. The opening of new area code is when the hoarding is most likely to take place and be the most harmful to the consumer and this prevents it *before* it happens. It also benefits the FCC because if and when they believe any organization might be hoarding, all they would have to do is ask for the order documentation and monthly bills for those 833 numbers taken during the rationing period. So any survey results that came out of this are nice but it'll both reduce hoarding and make it very hard for anyone hoarding anything to hide, regardless of how thorough the follow up survey process is.

There is a presumption of warehousing if the RespOrg “does not have an identified toll free subscriber agreeing to be billed for the service associated with each toll free number reserved” from the SMS/800 database. So RespOrgs can't claim they don't have this information. Somos clearly can't claim they can't handle this since they are at their heart, a data processing organization. Somos doesn't "manufacture" 800 numbers, it secures and maintains the information about them. Receiving the information (not even maintaining since there's no updating or changing necessary), about toll free numbers is THE CORE of its purpose and if they're not able to make a process to submit and collect this information or can't be trusted with this information we have much bigger problems than just how to allocate 833 numbers.

The theme for the Somos convention last year was *collaboration*, and it's time to work together better for the good of the industry. This additional information and transparency will certainly improve the release process and has no significant downside. The only real argument against requiring this information is that it's not how we always did it. That's true it's not how "we always did it" but quite frankly, it's time to bring the phone number allocation process out of 1992.

Respectfully submitted,

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