

Toll-Free 855 allocations by “Randomized Round Robin”

Vanity International, a consultancy and small RespOrg, hereby submits *reply* comments in response to the Commission’s Public Notice; DA 10-1604 in CC Docket 95-155 released August 27, 2010.

In our reply comments we wish to address the illusion of “equal access” by rationing, the futility of ration size, and why off-line allocation uniquely addresses the anomaly of a code opening.

The Illusion of “Equal Access” by Rationing

There seems to be a common misconception among those who submitted comments that a daily cap on toll free numbers, or even a replication set-aside, will somehow reduce computer load¹ or prevent inadvertent “log offs” and “lock outs” during the critical moments when the 855 code is opened. There’s no basis for this belief.

The only certain effect of “rationing” is that it will reduce the *duration* of the computer jam that will most surely occur upon the 855 code opening. The intent of an automated reservation system is to *be first* and that incentive endures regardless of whether there are 100, 1000, or 10000 permitted reservations. No one will “dial back²” their automation because of a cap or reduced availability, as suggested.

Indeed, massive automation is used every night against just a few dozen toll free numbers³ as they go spare. It only takes a few minutes, but any RespOrg who has ever tried knows they have *zero* chance of manually reserving numbers in the face of these automated systems.

An actual sample from the SMS/800 history file below is representative of an automated reservation. Toll free number 866-227-9277 was reserved on Aug 20, 2010 in **95 milliseconds**, as it went from “spare” status at 11:01 28.810 seconds to “reserved” status at 11:01 28.905:

Number	Date	Time	Status	RespOrg
866 2279277	2010-08-20	23:01:28.0 810	S(pare)	AT X01
866 2279277	2010-08-20	23:01:28.0 905	R(eserve)	AB C01

¹ From the Updated Comments of Bill Quimby: “*All of the [computer] capacity issues will be eliminated or greatly reduced with rationing.*” From the Toll Free Number Coalition, Comment (3): “The Coalition also respectfully submits that the restoration of the right of first refusal early reservation plan previously used for the 888 code release *would greatly lessen the demands on the code opening system, thus allowing more orderly access to the vast majority of the 855 numbers remaining.*”

² Randomized Round Robin proposal, Vanity International.

³ Each night at 11pm Central, the SMS/800 system spares toll free numbers at the end of their 4-month aging period.

No one on earth can type fast enough to compete with these automated reservation systems, and anyone without them – or without a hired agent – is hopelessly disadvantaged.

The fact is that here will be “*unfair and unequal access*,” as the Direct Marketing Association put it, if allocation is done by computer war – rationing or not; fixed or scaled. It just doesn’t matter. Those with the automation will get their allocation within seconds. The rest – those with manual access or small-scale automation-- will get “*leftovers*.”

The only advantage to a fixed or scaled daily “ration” will that the automated systems will be cut off at some point, so they won’t get all the numbers; just the best ones. Yet, let there be no illusion of fairness or “*equal access*.”⁴ The edict of, “*First come, First served*,” given today’s realities means, “*Big come, Big Served*.”

The Futility of Ration Size

It is essential to note that the vast majority of the comments supporting a daily “*anti-hording cap*” -- 93% as of 5PM, September 10, 2010 -- are a result of a write-in campaign⁵ by just one ambitious, yet misinformed, RespOrg operator who lacks any meaningful automation. Most of these commenters parrot Mr. Bill Quimby’s support for a daily cap on toll free numbers to, “*prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses*.”

Mr. Quimby is promoting the idea of a fixed daily ration of 500 or 1,000 regardless of customer base which, for example, awards him with exactly the same number of reservations as AT&T – a company almost 100 times his size, based on active toll-free numbers. This proposal flies in the face of fairness and appears to be self-serving.

Further, Mr. Quimby seeks to disadvantage RespOrgs who share a common administrator, by “rationing” on a per-administrator basis rather than a per-RepOrg basis. Such a restriction would pre-judge and penalize entities for how they manage their operations.

The FCC should also note that forming a primary RespOrg requires certification and several thousand dollars, so there is always some business rationale for doing so. Sub-RespOrg, however, can be formed by a signature and should not be given any weight.

⁴ The FCC’s stated intent in Commission’s Public Notice of August 27, 2010 is to, “*ensure that all parties have equal access to the new 855 toll free numbers*.”

⁵ 65 of the 72 comments submitted as of noon, September 10, 2010 appear to be a direct result of Mr. Quimby’s write-in campaign, which began on Aug 30, 2010.

Finally, Mr. Quimby's premise that the FCC must urgently act to prevent "holders" from depriving "real customers," is just a calculated distraction from a RespOrg operator who publically equates call centers with drug dealers.⁶

Clearly, the use of inflammatory language, the small business hardship plea, and the write-in campaign are all designed to justify his version of a rationing plan. Since when are call centers not "real customers?" Do larger RespOrgs like Verizon, Sprint, and AT&T no longer represent "real customers?"

The real reason we need a code opening plan was brought to light by the Toll Free Number Coalition in their "*Petition for Emergency Relief and Expedited Action.*" The Coalition clearly described the unjust experiences various RespOrgs had during the 877 and 866 codes opened. We, too, studied the aftermath of those code openings and agree with their background assessment.

When they described how past code openings were, "*confused and disorderly, with many RespOrgs 'locked out' of the SMS database for an extended period of time while one or more others reserved at least 10,000 numbers,*" those 10,000 reservations were not made by some "vanity number business," but by AT&T – the largest RespOrg and co-owner of the SMS/800 database.

Using the SMS/800 database for this code opening – regardless of cap size – will result in the same chaos as there is no practical difference to setting a cap of 100, 1000, or 10000. In fact, even if a cap were set at just one toll free 855 number per day, everyone would use their massive automation to get the one they want.

This great axiom foretells what we can expect on Oct 2, 2010 is:

To err is human- but to really foul things up requires a computer."
-Farmers' Almanac

⁶ From "1-800 Drug Dealer Close," Mr. Quimby says, "I just talked to someone that said an organization offering to rent a good 800 number offered 6 months free to test it. This might sound attractive to some people but it's kind of like an 800 number Drug Dealer offering free samples." See: <http://www.tollfreenumbers.com/blogs/shared-use/the-drug-dealer-close.html> (It is also the top "story" on September 10, 2010, so just go to www.tollfreenumbers.com if you are viewing today). The screen shot is also attached, should Mr. Quimby take down this article to prevent viewing.

Yet, even Mr. Quimby acknowledges that, “*the smaller the daily limit in the beginning, the more even the allocation of the most desirable numbers would be.*” We agree with this one point, and that’s why we proposed an allocation of one per RespOrg by using an off-line Randomized Round Robin – achieving a level of fairness and “*equal access*” that would take “forever” if attempted on-line using daily rations and our current system.

Why Off-line Allocation Uniquely Addresses the Anomaly of a Code Opening

The essence of this problem is the use of the SMS/800 database -- designed for everyday load⁷ -- under the stress and anomaly of a code opening. We can safely predict the results will be “*riddled with irregularities,*” as they were in the past.

Yet, we see no reason to take, “*appropriate steps to help assure that the [SMS/800] system is ready to handle the expected activity.*”⁸ Rather, why use it?

It’s not the SMS/800 system design or RespOrgs with automatic reservation systems that will cause this predictable outcome, but the anomaly of a code opening. Three unique factors mark this one-time event.

- Brut Force is of the essence: During the daily drop-to-spare, automation is not the only factor; intelligence also plays a key role, i.e. knowing which numbers go spare on what nights, for example. During a code opening, however, specialized knowledge is unnecessary – everyone knows what’s available -- so the brut force of automation is the *only* factor.
- There are *millions* of available numbers, not just the few hundred that go spare nightly.
- Massive RespOrgs who don’t bother with the nightly drop-to-spare, *always participate* in the code opening.

It makes no sense to upgrade the SMS/800 system for a one-time event when *better* results can be achieved with a spreadsheet in a matter of hours. With competitive reservations in place, SMS/800 system load will be close to normal upon opening and both the system design and automation systems will no longer be of issue.

⁷ In the comment by DSMI, Mr. Wade states, “*Like all well designed and properly sized systems, the SMS/800 system is designed to handle the normal day-to-day volume of traffic presented to it by its user population, with sufficient extra capacity to handle the expected peaks that occur from time to time.*”

⁸ Toll Free Number Coalition in their “*Petition for Emergency Relief and Expedited Action.*”

A Randomized Round Robin⁹ (RRR) is a proven process that *exactly* solves the unequal access problem. During each round, *every* RespOrg has an opportunity to reserve one number – regardless of access or automation. In addition:

- Every number from every RespOrg is processed and all known demand is satisfied;
- The code opens under close to normal load, as all known competitive reservations are already in place; and
- There's no technical reason to delay the submissions beyond the scheduled date of October 2, 2010.

Our industry was build upon the edict of, "*First come, first serve.*" Yet, there's no inherent requirement that the massive demand of this code opening be satisfied *live* in the SMS/800 database when a RRR can provide truly "*equal access*" in an orderly process.

The fact is that computers are just tools, and there is no doubt that SMS/800 was not built for the massive job of a code opening – known both by admission and previous experience. So rather than permit "*unfair and unequal access*" to rule the day, we recommend that DSMI allocate competitive 855 numbers off-line using RRR.

Randomized Round Robin works by mathematics; it cannot fail.

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⁹ See September 3, 2010 filing by Vanity International, "*Randomized Round Robin.*"

The following is a true and correct screen shot of Mr. Quimby's website as of 5PM, September 10, 2010:

The 1-800 Drug Dealer Close



I just talked to someone that said an organization offering to rent a good 800 number offered 6 months free to test it. This might sound attractive to some people but it's kind of like an 800 number Drug Dealer offering free samples. Once you put it in your advertising, it's VERY hard to change! I always warn people that the more you advertise someone else's number, the more at their mercy you become. So anyone renting you a toll free number will be more than happy to let you start advertising it, because they know that you can't just change the number in your advertising very easily. And it's even worse when you integrate the number right into your corporate identity.

It's not just the difficulty of changing the number in your advertising. It's also the advertising equity that you build up over time. You've heard that advertising requires repetition. Another way of saying that is that the more you advertise a vanity number the more you increase its value. Unfortunately if you're renting the number, you're just increasing your dependency on it. And the company offering you the number and the free trial knows that. So the price or rate per minute or additional fees etc are likely to go up, simply because they have no incentive to keep them competitive.

That's why I say that even if an organization seems professional, attractive or responsive when they're trying to sell you on using their number, be very careful. Once you've advertised the number and you're hooked on it, even if they don't have a drug dealer attitude, they're not going to be as responsive and accommodating and they're going to think it's only fair that you pay more because the number has become so valuable to you (thanks to all your advertising!) You get the idea.

☆☆☆☆☆ (No Ratings Yet)
