Toll-Free 855 allocations by "Randomized Round Robin"

Vanity International, a consultancy and small RespOrg, hereby submits *Ex Parte* comments in response to the Commission's Public Notice; DA 10-1604 in CC Docket 95-155 released August 27, 2010. Presented here are some essential observations with context:

- DSMI acknowledged that users with a MGI[1] interface were "idled and then disconnected" or stalled for up to 20 minutes during testing – *replicating* our experience at the 866 opening – yet the system, "*did not freeze.*" That <u>is</u> the problem. MGI requests were processed – 10,000 for AT&T by our count alone –while everyone else <u>waited</u>. "*Improving*" this problem by even 90% would still leave those without MGI access at a disadvantage – still 1,000 to 1.

- DSMI and SMS/800 suggested that RespOrgs could simply choose[2] MGI . Sure, and we can all choose *private jets* to get around, but who can afford it? MGI access requires robust testing, certification, and customized software— a quantum leap in commitment for a RespOrgs currently using a SecureID.

- The only ominous sounding "*randomization tool*" needed by DSMI or SMS/800 is a spreadsheet. Microsoft's Excel will do nicely. Further, we'd be surprised if the Help Desk does not already have a batch tool to reserve the resulting lists of numbers by RespOrg. They reserve numbers all the time.

- The Coalition observes that RRR, "*will randomize the request, meaning the customer will have as good a chance of getting his fifth choice as his first.*" Exactly. RespOrgs also control list *size* and these two features work together. With randomization, speculators <u>cannot</u> secure all the best toll free numbers in the first few rounds, giving everyone a random chance of being "*first come, first serve.*" RRR does not "*waive*" the promise, just changes the process.

- The Coalition further observes that, "*submitting the additional choices will <u>reduce</u> the customer's likelihood of getting his first choice...*" Exactly. Put another way, "*Piggies get fed; Hogs get slaughtered.*" Combined with list size, randomization defeats speculation by pushing some of the top choices into later, less-fruitful rounds. The bigger the list, the deeper the push.

<div align="right">

Loren Stocker
www. TollFreeMarket.com

</div>

---

[1] To *"..smaller Resp Orgs … waited nearly 20 minutes to get a response from the system, and the browsing session of users of the GUI interface were similarly idled and then disconnected after 6 minutes,*" DSMI responds, "*This may be correct.*"
[2] DSMI asserts, "*… Resp Orgs choose their form of access to the SMS/800 system. To the extent that any particular Resp Org believes that a particular form of access is not equal, it is free to choose another form of access.*"