Internet History we all Should Know.

Recent history suggests that lowering SMS/800 access "speed" would have the very predictable effect of *exploding* the number or RespOrg by a factor of 2-10, or more—and do nothing to help those without automation. For those of us with Internet domain experience, this would be "*Déjà vu, all over again*," as Yogi Berra once said.

About ten years back Internet domain speculators were causing havoc in the .com/.net/.org registries attempting to reserve domains as they went "spare," resulting in frequent computer jams and system access issues. This was not just due to domain "openings," but became an everyday issue. Sound familiar?

The initial solution was to put "drops" on an isolated server bank and ensure that all domains became available at a predictable time (à la SMS/800 operation), but then someone implemented a grand idea—limiting bandwidth to 250 kb/sec to reduce request speed. That way, each Registrar — the Internet equivalent of a RespOrg — could only submit a limited number of requests per minute. On it's face, it seems like a brilliant solution to the fairness issue, but it backfired. Big time.

Enterprising Registrars simply *replicated* themselves to increase bandwidth. For example, Moniker, a well know Internet domain manager, now <u>owns around 130 Registrars for the sole purpose of circumventing bandwidth limits</u> as they go after expired domains. Others Registrars created dozens of replicates, leaving those with a single system ID at an enormous disadvantage – far *worse* than before.

There's one sure way to start an "arms race" for SMS/800 access: lower the hourly reservation request limit or limit access bandwidth. Further, because bandwidth is an *operational* necessity — and every new RespOrg *must* have access, — bandwidth <u>cannot be denied</u> to replicated RespOrgs. In contrast, replication for the sole purpose of securing extra slots on a Randomized Round Robin would be an obvious and correctable ploy; operational access is not at stake.

The immediate effects of a lower "speed limit" would be to level the playing field – *among automated RespOrgs,* chocking down the larger ones so that the smaller ones could compete — once again placing large carriers like AT&T, Verizon, Sprint, Qwest, and others at a disadvantage. Yet, a "speed limit" does <u>nothing</u> to help those without automation nor does it further the Commissions stated goal, "*to ensure that all parties have equal access to the new 855 toll free numbers*."

A "speed limit" would simply "*ensure that all parties WITH AUTOMATION have equal access to the new 855 toll free numbers*." If Internet history is any indication, the rest would just watch as more and more "parties" piled on.

Loren Stocker
www.TollFreeMarket.com