

3. Direct each Resp Org to file with the Commission and SMS/800 an affidavit, subject to perjury sanctions, disclosing any common ownership relationship with another Resp Org;

The Coalition further urges the Commission to postpone the release of any additional toll free service codes until such time as DSMI has demonstrated to the satisfaction of the Commission that any new allocation will be administered in accordance with the specific directions provided by the Commission in its September 30, 2010 order in this Docket ("855 Order") and in accordance with the relief sought herein.

Finally, to the extent the above changes require amendments to the Commission's rules, the Coalition urges the Commission to institute a rulemaking proceeding.

Background

The Commission has long recognized that toll free numbers "comprise a finite and very valuable public resource" which meets critical business functions and services the needs of thousands of consumers. *See, e.g., In the Matter of Toll Free Service Access Codes*, 10 FCC Rcd 13692 (1995). To ensure these benefits, pursuant to Section 251(e)(1) of the Act, the Commission has adopted policies to require the allocation of toll free numbers among domestic users on a fair, equitable and orderly basis. *Toll Free Service Access Codes*, 13 FCC Rcd 9058 (1998) ("*Fourth Report and Order*"), ¶¶ 12, 13.

Central to the realization of these goals are two central principles: *First*, that access to the SMS/800 database is a common carrier service that must be tariffed at reasonable rates and on nondiscriminatory terms,² and *secondly*, that DSMI, the entity designated by the Commission

² *Beehive Telephone, Inc. and Beehive Telephone Nevada, Inc. v. The Bell Operating Companies*, FCC 95-358, released August 15, 1995, ¶ 15.

to serve as the administrator of the toll free number database system, must operate on a neutral and impartial basis.³

Although Section 52.111 of the Commission's rules, 47 C.F.R. § 52.111, generally mandates the allocation of numbers on a first come, first served basis, the rule expressly authorizes the Commission to direct an alternative method and, pursuant to Section 1.3 of the Commission's rules, 47 C.F.R. § 1.3, the Commission may waive any of its rules where particular facts would make strict compliance inconsistent with the public interest. Citing this authority in its *855 Order*, the Bureau mandated "a limited deviation" from the first come, first served rule, "to ensure a more equitable distribution of 855 toll free numbers." *855 Order* at ¶ 6. Specifically, the Bureau directed DSMI to limit each Resp Org to 100 numbers in the 855 code per day, for the first 30 days that the code was open. In reaching this result, the Bureau cited the concerns of commenters regarding potential anticompetitive conduct by larger Resp Orgs during prior releases (888, 877 and 866), and concluded that an alternative approach was "necessary to help prevent this activity and ensure a fair allocation of 855 numbers to all Resp Orgs and, in turn, to all toll free subscribers." *Id.* at ¶ 3.

The Coalition applauds the Commission's continuing commitment, as reflected in its April 4, 2013 Public Notice, to enhance access to toll free numbers "on an equitable basis," and urges the Commission to extend the distribution method adopted for the 855 code to 844 numbers, incorporating modifications described herein.

As Attachment A indicates (prepared as of October 8, 2010), there were at least 24 companies with two or more Resp Org IDs, the first two digits of which are different. Under

³ See *Toll Free Access Codes*, FCC 00-237, released July 5, 2000 ("*Beehive Order*"); 47 C.F.R. § 52.12(a)(1). See also *Transaction Network Services, Inc., TSYs Acquiring Solutions, LLC, and Electronic Payment Systems, LLC*, DA 11-355 (February 24, 2011) (DSMI must comply with applicable statutory provisions, Commission and court precedent and tariff provisions).

DSMI's stated implementation plan, these companies were considered to be multiple entities, and each was allocated 200 to 700 of the 855 numbers each day, as opposed to the 100 numbers allocated to other Resp Orgs.

In the last three years, the situation has deteriorated markedly. As shown in Attachment B, 100 of the two digit Resp Org IDs are now associated with 35 companies that share identical Company Names, Contact Names, Phone Numbers, Fax Numbers or Email Addresses. Collectively, these 35 groupings can reserve a total of 7,200 additional numbers per day for the first 30 days a code is opened than they would be permitted if they were limited to 100 per grouping. While it is possible that some of these groupings include unaffiliated companies, the companies should be required, through the submission of affidavits, to overcome the reasonable presumption that they are affiliates.⁴

For a small number of companies to receive multiple 100 number daily allocations during the first 30 days a code is opened based on the fact that they control more than one Resp Org entity is patently discriminatory and contrary to the Commission's adopted policies that require the allocation of toll free numbers on an equitable and efficient basis. All due efforts should be taken to prohibit this from happening. These additional reservations will deplete the amount of 844 numbers available to other Resp Orgs, including Petitioners, to their direct detriment.

The implications of entities having more than a single Resp Org stretch beyond new toll free code openings. Limitations on the quantity of toll free numbers each Resp Org can have in reserve status as well as limitations imposed by DSMI on SMS/800 CPU usage are also affected.

⁴ SMS/800 itself recognizes the fact that several Resp Orgs are under common ownership and control and has recently developed a plan to expand the control of SMS/800 Inc. from the BOC's alone to the broader toll free industry. A critical element of that plan is a mechanism for identifying companies with common ownership and control over multiple Resp Org entities, and treating all such related entities as a single company for the purposes of voting for Board Members and representation as SMS/800 Inc. member companies. See Attachment C hereto (April 25, 3013 letter from Thomas FitzGerald, with attached Designation of Executive Contract and Declaration of Affiliated Companies). The Affiliated Companies Declarations are on file with SMS/800.

Implementation of these limits, which have been set by order of the Commission, should be revisited, and the Commission should mandate how entities with multiple Resp Orgs are to be treated. This is a serious problem that needs to be addressed in all areas of Commission toll free rules and DSMI operating procedures, including but not limited to the proposed opening of the 844 code.⁵

Request for Action

To address these inequities, the Coalition urges the Commission to adopt the following measures:

- Amend the SMS/800 Tariff. The Commission should direct SMS/800 to amend its tariff to prohibit the participation by multiple Resp Orgs affiliated by common ownership from reserving or otherwise participating in the reservation and allocation of toll free numbers during the 844 and any subsequent code release. To the extent SMS/800 extends to multiple Resp Orgs under common ownership other rights in the participation in the toll free number allocation process, these rights should be terminated as well.
- DSMI Number Assignments. During the restricted reservation period for a new code, the Commission should prohibit DSMI from assigning toll free numbers to any Resp Org affiliated by common ownership with another Resp Org which seeks, or has received, toll free numbers in the same code.

⁵ Although outside the scope of the allocation of 844 toll free numbers, the Coalition also urges the Commission to examine the recent rapid depletion of toll free numbers which has precipitated the Bureau's Public Notice. In its April 4, 2013 letter, attached hereto, SMS/800 alerted the Chief of the Bureau to the recent "material increase in the number of toll free numbers reserved," resulting in a "substantial reduction in the spare number pool," with only about 10.5% remaining in the existing supply. As shown in Attachment D hereto, a time chart of SMS 800 Utilization, from February 18, 2013 through March 18, 2013, the number of toll free numbers in Spare Status dropped by over 1,000,000, from 5,626,255 to 4,559,893.

- Resp Org Affidavits. The Commission should direct each Resp Org to file with the Commission and SMS/800 an affidavit, subject to perjury sanctions, disclosing any common ownership relationship with another Resp Org;

The Coalition respectfully submits that adoption of the above measures will ensure serve the public interest by helping to ensure an efficient and equitable distribution of new numbers at the code's opening. In the event the Commission does not adopt these measures and the unfair practices described above persist, members of the Coalition reserve the right to seek appropriate legal recourse.

WHEREFORE, the 844 Release Coalition respectfully urges the Commission to grant the relief requested herein.

Respectfully submitted,

THE 844 RELEASE COALITION

By:



Eric Fishman, Esq.
Phillips Nizer LLP
666 Fifth Avenue
New York, New York 10103-0084
Phone: 212-841-0537
FAX: 212-262-5152
Email: efishman@phillipsnizer.com

May 6, 2013

Entity Affiliations - 855 Release
Attachment A

Company	# of Entities	Allocations
AT&T	7	700
Verizon	7	700
Prime Tel	6	600
Level 3 Communications	5	500
Birch Telecommunications	4	400
Rolinium	4	400
Cavalier	3	300
McLeod	3	300
Qwest	3	300
Utel	3	300
Vanity International	3	300
Acceris Solutions	2	200
Allstream	2	200
ANI-Networks	2	200
Broadview Networks	2	200
CSF	2	200
Global Crossing	2	200
Incontact Inc.	2	200
International Telecommunications Solutions Inc.	2	200
One Communications	2	200
Phone People	2	200
Primus	2	200
Windstream Nuvox	2	200
XO Communications	2	200
24	<u>74</u>	<u>7400</u>
		<u>2400</u>
		<u>5000</u>

Entity Affiliations - Current
Attachment B

Company	# of Entities	Allocations
AT&T	8	800
Verizon	7	700
Prime Tel	6	600
Level 3 Communications	5	500
Beckham Telecom	4	400
Windstream Communications	4	400
Bodition	4	400
Sofline Studios	4	400
Acceris Communications Partners	4	400
Paetec Communications	5	500
Cavalier	3	300
ABCO Communications Inc.	3	300
Qwest Corporation	3	300
Teligence	3	300
Birch Telecommunications Inc.	3	300
Excel Telecommunications	3	300
Allstream	2	200
Broadview Networks	2	200
DC Communications	2	200
Electric Lightwave/Integra Telecom	2	200
American Data Networks	2	200
XO Communications	2	200
Micronesia Telecommunications	2	200
Mpower Communications	2	200
ANI-Networks	2	200
Commercial LT Baroda SA	2	200
Hobby.Com Inc.	2	200
Global Crossing	2	200
Automate My Resporg	2	200
Incontact Inc.	2	200
Capsule Communications	2	200
ITC Deltacom	2	200
ANPI	2	200
csf Corporation	2	200
Next Communications	2	200
	<u>107</u>	<u>10700</u>
		<u>3500</u>
		<u>7200</u>

ATTACHMENT C

SMS/800

April 20, 2012

SENT VIA FEDEX

Heather Welch
200 Church St.
Burlington, Vermont 05401

Re: *SMS/800 System Oversight and Management*

Dear Heather Welch,

Please allow me to introduce myself, my name is Tom FitzGerald, newly appointed President and CEO of SMS/800, Inc. It is my honor to have been chosen to lead SMS/800, Inc. into the future. During the short period of my tenure, I have been able to meet and work with the industry representatives comprising the Transition Committee to develop a detailed plan to bring you, the SMS/800 customer, into the leadership and evolution of the toll-free industry. Our goal, with your participation, is to solidify the future of toll-free services through teamwork, innovation and hard work. Today I am writing to inform you of the many exciting changes happening in the toll-free number industry that you will want to be aware of and take part in. Please be sure to assist us by completing and returning the attached form so that we can continue to serve you.

Through a collaborative effort between SMS/800, Inc., the industry Transition Committee and the Bell Operating Companies, we have developed a way for your company to have a bigger say and responsibility in the management and operations of the SMS/800 system. Specifically, we have developed a proposal that we plan to bring to the FCC that will allow for your company to be a member of SMS/800, Inc. and elect several industry representatives to the SMS/800, Inc. Board of Directors ("Board"). We will be presenting the proposal to you in an industry wide forum in the near future.

We are encouraged and enthusiastic about this significant change in the toll-free industry but your participation is critical for its success.

To prepare for this change, we will need some information from your company about who will represent it in connection with becoming a member of SMS/800, Inc., submitting candidates for the Board and casting votes in Board elections.

SMS/800

Therefore, please review, complete and sign the enclosed DESIGNATION OF EXECUTIVE CONTACT AND DECLARATION OF AFFILIATED COMPANIES form and return it to us by email fax or mail, as indicated below, by **May 4, 2012**.

By email to: Governance@SMS800Inc.com

By mail to: SMS/800, Inc.
ATTN: Governance Matters
P.O. Box 8122
Bridgewater NJ 08807-8122

By fax to: (732) 336-3295

The information provided on the enclosed forms is for internal SMS/800, Inc. corporate governance purposes only and will not be made public.

It is critical that this and all subsequent communications reach the appropriate executive in your company, so that he or she will be informed of these changes and be able to fully participate and benefit from the opportunities presented by the changes described in this letter.

Please contact me at Tom.FitzGerald@SMS800Inc.com if you have any questions about this letter or the attached form.

Best regards,

Handwritten signature of Thomas FitzGerald in black ink.

Cc: Stephanie Perrotte
SMS/800, Inc. Board of Directors
Michael Wade, DSMI
Anil Patel, DSMI

DESIGNATION OF EXECUTIVE CONTACT
AND DECLARATION OF AFFILIATED COMPANIES

The person designated below will serve as your company's Executive Contact for all communications to and from SMS/800, Inc. in connection with corporate governance matters. Your Executive Contact will be responsible for nominating candidates for election to the SMS/800, Inc. Board of Directors and casting votes on behalf of your company for SMS/800, Inc. Board of Director elections in which your company is eligible to vote. In addition, your Executive Contact will be responsible for taking any necessary actions as a member representative to the SMS/800, Inc. on behalf of your company and all other Responsible Organizations (Resp Orgs) and/or Service Control Point Owners/Operators (SCP O/Os) related to your company by virtue of having commonality of ownership and control, as further described below in the "Declaration of Related Companies" section. All correspondence related to SMS/800 Inc. corporate governance will be addressed directly to the Executive Contact that you designate on this form.

It is your responsibility to contact SMS/800, Inc. at Governance@SMS800Inc.com with any updated information about your designated Executive Contact including name, email address, telephone number and mailing address. Unless you otherwise inform us in writing, the Executive Contact information you provide on this form will renew automatically on an annual basis.

All forms must be completed, signed and returned to SMS/800, Inc. by May 9, 2013. The information provided on these forms is for internal corporate governance purposes only and will not be made public.

DESIGNATION OF EXECUTIVE CONTACT

Legal Name of Company: _____

Primary Entity Code: _____

Company Mailing Address:

Name and Title of Executive Contact: _____

Executive Contact Mailing Address (if different from Company Mailing Address):

Executive Contact Phone: _____

Executive Contact Email: _____

DECLARATION OF AFFILIATED COMPANIES

Please list below those two-character Resp Org Entity Codes and SCP O/O IDs for all companies for which there is a relationship of *common ownership and control* as defined below.

The term "common ownership and control" should be interpreted to mean either *de jure* or *de facto* control of a company.

A company has *de jure* control if such company possesses, directly or indirectly, an equity interest by stock, partnership (general or limited) interest, joint venture participation, or member interest in another company in excess of fifty percent of the total equity interests in the other company. In addition, *de jure* control can be established if a company possesses the power to vote more than fifty percent of the securities (by stock, partnership (general or limited) interest, joint venture participation, or member interest) having ordinary voting power for the election of directors, general partner, or management of such other company.

A company has *de facto* control if such company possesses the power to direct or cause the direction of the management and policies of such other company, whether through the ownership of or right to vote voting rights attributable to the stock, partnership (general or limited) interest, joint venture participation, or member interest of such other company, by contract (including but not limited to stockholder agreement, partnership (general or limited) agreement, joint venture agreement, or operating agreement), or otherwise.

The Following two-character Resp Org Entity Codes and/or SCP O/O IDs are related by way of common ownership and control (as defined above) with the above named company and will be represented by the Executive Contact designated on this form.

Two-character Resp Org Entity or SCP O/O ID # (attach additional sheet if necessary):

LP _____

I certify that the foregoing information is true and correct and that I am duly authorized to sign this DESIGNATION OF EXECUTIVE CONTACT AND DECLARATION OF AFFILIATED COMPANIES on behalf my company as of this ____ day of _____, 2012.

Name: _____

Title: _____

ATTACHMENT D

SMS 800 Utilization

Historic Data listed Quarterly
(followed by weekly totals)

Date	800 Numbers In Use	800 % In Use	888 Numbers in Use	888 % in Use	877 Numbers in Use	877 % in Use	866 Numbers in Use	866 % in Use	855 Numbers in Use	855 % in Use	TOTAL NUMBERS IN USE	TOTAL % IN USE	800 Spare	888 Spare	877 Spare	866 Spare	855 Spare	TOTAL SPARES
01/02/13	7,870,093	100.00%	7,829,809	98.12%	7,487,400	83.53%	7,979,948	100.00%	2,739,894	34.33%	33,907,144	85.22%	-	150,191	492,600	52	5,240,105	5,862,949
01/07/13	7,870,093	100.00%	7,851,002	98.38%	7,513,824	94.16%	7,980,000	100.00%	2,741,078	34.35%	33,955,968	85.34%	-	128,998	466,176	-	5,238,921	5,834,095
01/14/13	7,870,093	100.00%	7,855,309	98.44%	7,534,983	94.42%	7,979,926	100.00%	2,753,468	34.50%	33,993,379	85.43%	-	124,691	445,417	74	5,226,532	5,796,714
01/21/13	7,870,093	100.00%	7,872,151	98.65%	7,547,526	94.59%	7,979,994	100.00%	2,772,116	34.74%	34,041,880	85.55%	-	107,849	432,474	6	5,207,884	5,748,213
01/28/13	7,870,093	100.00%	7,877,258	98.71%	7,548,357	94.59%	7,979,985	100.00%	2,784,494	34.89%	34,050,197	85.60%	-	102,742	431,643	5	5,195,506	5,729,896
02/04/13	7,870,093	100.00%	7,880,952	98.76%	7,550,107	94.61%	7,979,989	100.00%	2,786,758	35.03%	34,076,699	85.64%	-	99,048	429,883	11	5,184,242	5,713,194
02/11/13	7,870,093	100.00%	7,885,445	98.82%	7,567,942	94.84%	7,980,001	100.00%	2,812,409	35.24%	34,115,890	85.74%	-	94,555	412,058	-	5,167,591	5,674,204
02/18/13	7,870,093	100.00%	7,915,372	98.19%	7,579,920	94.99%	7,979,984	100.00%	2,816,459	35.24%	34,163,638	85.86%	-	64,628	400,080	6	5,161,541	5,626,255
02/25/13	7,870,093	100.00%	7,930,469	99.38%	7,594,245	95.17%	7,979,983	100.00%	2,843,223	35.53%	34,219,023	86.00%	-	49,531	385,755	7	5,136,777	5,572,070
03/04/13	7,870,093	100.00%	7,970,066	99.88%	7,637,930	95.71%	7,978,061	99.98%	2,914,353	36.52%	34,370,523	86.36%	-	5,704	342,070	1,919	5,065,647	5,419,570
03/11/13	7,870,093	100.00%	7,974,298	99.93%	7,641,069	95.75%	7,979,666	100.00%	2,937,901	36.82%	34,403,025	86.46%	-	5,704	338,631	334	5,042,069	5,387,068
03/18/13	7,870,093	100.00%	7,979,774	100.00%	7,979,959	100.00%	7,979,960	100.00%	3,020,384	42.86%	35,230,200	88.54%	-	228	41	10	4,569,616	4,559,893
03/25/13	7,870,093	100.00%	7,979,865	100.00%	7,979,869	100.00%	7,979,866	100.00%	3,032,761	48.03%	35,620,251	89.54%	-	135	131	13,337	4,147,238	4,160,842
04/01/13	7,870,093	100.00%	7,979,969	100.00%	7,974,417	98.93%	7,979,486	99.99%	3,065,780	49.57%	35,759,775	89.87%	-	1	5,583	514	4,024,220	4,030,318
04/08/13	7,870,093	100.00%	7,977,811	98.97%	7,977,922	98.97%	7,971,841	99.30%	3,067,364	48.72%	35,765,981	89.86%	-	2,169	2,028	6,159	4,012,636	4,023,012
04/15/13	7,870,093	100.00%	7,979,969	100.00%	7,980,000	100.00%	7,979,984	100.00%	3,078,218	49.85%	35,786,305	89.94%	-	1	-	6	4,001,781	4,001,788
04/22/13	7,870,093	100.00%	7,979,523	99.96%	7,977,617	98.97%	7,979,312	99.99%	3,090,828	50.01%	35,797,374	89.97%	-	477	2,383	688	3,989,171	3,992,719
04/29/13	7,870,093	100.00%	7,978,768	100.00%	7,978,727	100.00%	7,979,823	100.00%	4,122,728	51.66%	35,932,140	90.30%	-	232	273	177	3,857,271	3,857,953

ATTACHMENT E

LIST OF MEMBERS OF 844 RELEASE COALITION

List of Participating Companies (57)
844 Release Coalition 050613

	Name
OU	24-7-365 INC. (JGL01)
AU	365 Wireless LLC (IDL01)
LP	800 Response Information Services, LLC (LPS01)
LS	Airespring Inc (KDB01)
UD	Allstate Communications Inc. (AYL01)
NS	Astro Companies LLC (KJT01)
RT	ATL Communications (AUA01)
BV	Beehive Telephone Inc. (BVE01)
CJ	Bell Canada (CNM01)
KW	CallSource (OU800)
PY	Capital Management LLC (CLC01)
BI	CapitalSource Bank (MFP01)
VH	Cbeyond Inc (OJB01)
PW	Contact Solutions (MST01)
JG	Cooperative Communications (CJI01)
QH	CoSpeed LLC (WJC01)
WD	Direct Results (GNB01)
GH	Elite Brands (NWE01)
KJ	EMERGENCY COMMUNICATIONS NETWORK LLC (TBI01)
FZ	Empire One Telecommunications Inc. (CCA01)
TK	Express Communications (XPS01)
DU	Fractel LLC (PYF01)
RP	Grande Communications Networks Inc (KWN01)
VY	Iowa Communications Network (IOW01)
GN	iProbe Multilingual Solutions Inc. (JLO01)
IO	Junction Networks (UQG01)
TJ	K.T. Communications Inc. (KCI01)
QG	LeaseHawk LLC (LSCIM)
TE	Lightyear Network Solutions LLC (UDI01)
HC	MetTel (MET01)
EW	Nation Wide 800 (WDE01)
XP	National Comtel Network Inc. (HCN01)
CC	Netcarrier Telecom (QHH01)
OV	Network Telephone Services Inc. (NSI01)
TB	New Network (EWN01)
WJ	Pac-West Telecomm Inc. (PWT01)
TL	Point Telecom Inc (RTI01)
CL	Shepher Corporation (KUB01)
ID	Sigecom (HOT01)
MS	Soutine Enterprises (KOK01)
KU	TalkPath LLC (DUN01)
MF	TCO NETWORK INC (QGB01)
JL	Telekenex (TKX01)

**800 Response Marketing
Proprietary & Confidential**

File: G:\SHRDOCS\GEN\844 Coalition\844 release coalition member listing 57 companies 050613

NW	Telengy LLC (TEG01)
GY	Telescan Inc. (RPT01)
KC	TeleServices Inc. (TJC01)
KD	THE Telco (XBA01)
FM	Threshold Communications Inc. (VHS01)
AV	Unipoint Services Inc (GHI01)
CZ	VBI (FZF01)
HO	VCOM Solutions Inc. (VYC01)
CN	Voce Telecom (BIR01)
AY	VOLO LLC (OVO01)
ME	Voxbeam Telecommunications Inc (VKS01)
NA	VPT Inc. (VPT01)
OS	Warning Communications Inc. (WNM01)
QP	Wiphonica Technologies Inc. (TLA01)

**800 Response Marketing
Proprietary & Confidential**

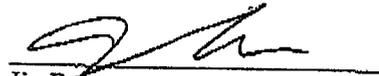
File: G:\SHRDOCS\GEN\844 Coalition\844 release coalition member listing 57 companies 050613

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that 24-7-365, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

24-7-365, Inc.

By:


Jin Ba
President

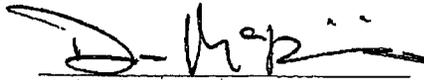
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [365 Wireless LLC] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

365 Wireless LLC

By:



Donny McKinnies

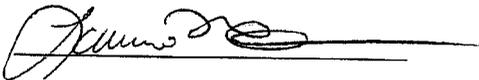
Director

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that 800 Response Information Services, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

800 Response Information Services, LLC

By: 

Laura Noonan
Vice President

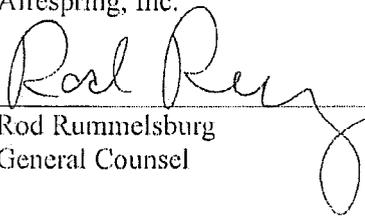
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Airespring, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Airespring, Inc.

By:


Rod Rummelsburg
General Counsel

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Allstate Communications, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

AYL01, Allstate Communications, Inc.

By:



Jim Cox
Director of Operations

May 6, 2013

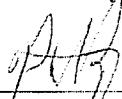
CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Astro Companies, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Astro Companies, LLC

Date: May 06, 2013

By:



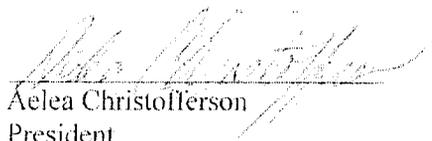
Mike Ray
Managing Partner

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that ATL Communications is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

ATL Communications

By:


Aelea Christofferson
President

May 1, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Beehive Telephone Co., Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Beehive Telephone Co., Inc.

By:


Name: John D. Brewer
Title Assistant General Manager

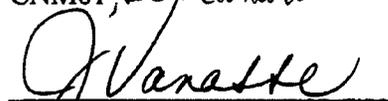
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that CNM01 is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

CNM01, Bell Canada

By:



Name Joanne Vanasse

Title Manager - Toll

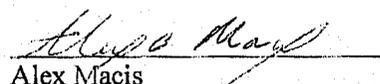
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [CallSource] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

CallSource

By:



Alex Macis
Carrier Relations Manager

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Capital Management LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Capital Management LLC

By: 
Michael Ambrose
Member

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that CapitalSource Bank is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

CapitalSource Bank

By: Allen McMullen
Allen McMullen
Sr. Telecommunications Engineer

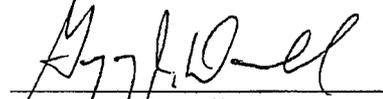
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Cbeyond Communications, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Cbeyond Communications, LLC

By:



Gregory J. Darnell
Director, LEC Relations

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that MST01 is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NAME OF RESP ORG: MST01 Contact Solutions

By: Sharon K Plummer Please accept my electronic signature on this line

Name: Sharon Plummer

Title: Lead Telecom Analyst

May 6, 2013

Sharon Plummer
Lead Telecom Analyst
Office: 703-480-1638
Mobile: 703-483-1017
Aim: PlummerCSI



Inventing Real Customer Service™

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [Cooperative Communications] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Cooperative Communications

By:



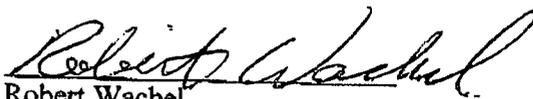
Michael Lombardi
Toll Free Engineering

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Cospeed, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Cospeed, LLC

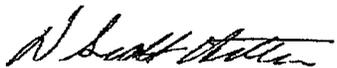
By: 
Robert Wachel
CTO

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that DIRECT RESULTS, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

DIRECT RESULTS, Inc. (Resporg ID GNB01)



May 3, 2013

Name: D. SCOTT HUNTER
Title: PRESIDENT

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that "Elite Brands" is a Responsible Organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Elite Brands

By:



Andrew Tolchin, Esq.
General Counsel

April 29, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that FBI01 is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

FBI01, Emergency Communications Network LLC

By:

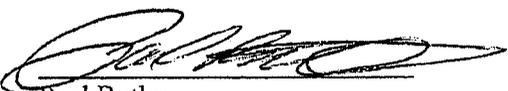

Jim Haddock
Production Manager

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Empire One Telecommunications, Inc is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Empire One Telecommunications

By: 
Paul Butler
President

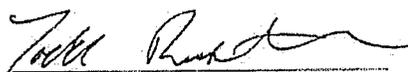
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Express Communications is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Express Communications

By:



Todd Reistroffer
Networks Operations Supervisor

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Fractel, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Fractel, LLC

By:



Michael A. Crown

President

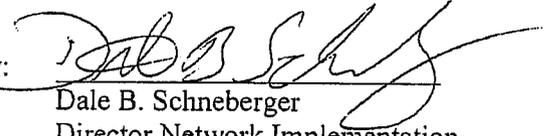
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Grande Communications Networks, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Grande Communications Networks, LLC

By:



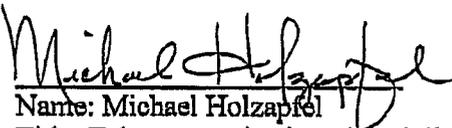
Dale B. Schneberger
Director Network Implementation

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Iowa Communications Network is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Iowa Communications Network

By: 
Name: Michael Holzapfel
Title: Telecommunications Specialist Sr.

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that iProbe Multilingual Solutions, Inc, [JLO01] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

iProbe Multilingual Solutions, Inc.

By:

Julie H. Setbon
CEO

A handwritten signature in black ink, appearing to read "JMSIL", is written over a horizontal line. The signature is enclosed within a hand-drawn oval.

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Junction Networks (UQG01) is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Junction Networks (UQG01)

By: Michael D. Oeth, CEO
Name
Title

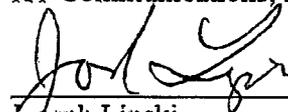
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that KT Communications, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

KT Communications, Inc

By:



Joseph Lipski
President

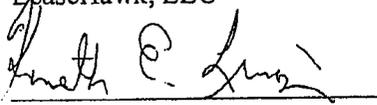
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that LeaseHawk, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

LeaseHawk, LLC

By:



Kenneth E. Linger
Director of Enterprise Systems

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that ~~Lightyear Network Solutions, Inc.~~ is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Lightyear Network Solutions, Inc.

By:

Edward J. Wagner 5/1/13

~~Edward J. Wagner~~
Sr. Vice President of Operations

May 1, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that MetTel is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

MetTel

By:


Bert Prince
Director

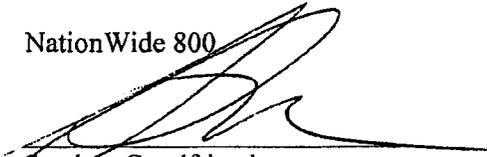
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that NationWide 800 is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NationWide 800

By:


Stephen Goodfriend
VP Operations

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [National ComTel] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

National ComTel

By:



Name Todd McIntyre

Title President

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Netcarrier Telecom, Inc. is responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NAME OF RESP ORG

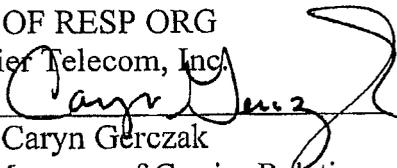
Netcarrier Telecom, Inc.

By: _____

Name: Caryn Gerczak

Title: Manager of Carrier Relations

May 6, 2013

A handwritten signature in black ink, appearing to read "Caryn Gerczak", is written over a horizontal line. The signature is stylized and includes a large loop at the end.

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that NSI01 is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NSI01, Network Telephone Services

By:



JANET ANDERSON

MANAGER SALES ADMINISTRATION

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [REDACTED] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

New Network

By:



[REDACTED]
[REDACTED]: Toll free Coordinator

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [PWT01] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Pac-West Telecomm, Inc

By:

Debbie Tut
Debbie Tut
Director Customer Operations

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Point Telecom, Inc. is a responsible organization, that it is a member of the RFI Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Point Telecom, Inc.

By


Kim Crowther
Vice President

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Shepher Corporation is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Shepher Corporation

By: 

Ofer Shepher
Senior Vice President

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that SIGECOM, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

SIGECOM, LLC

By: 
Brad Quick
Sales Engineer

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [NAME OF RESP.ORG] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NAME OF RESP.ORG

Sartine/Kalco/

By:

Name

Title


owner

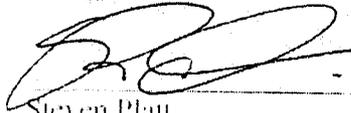
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Talkpath, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Talkpath, LLC

By:



Steven Platt
Network Administrator

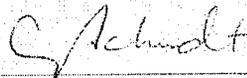
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that TCO Network is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

TCO Network (QGB01)

By:



Carrie Schmidt
Product/Implementation Manager

May 6, 2013

TIME RECEIVED	REMOTE CSID	DURATION	PAGES	STATUS
May 3, 2013 9:22:36 AM PDT		41	1	Received

May 03 15 09:14a

p.1

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [NAME OF RESP. ORG] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NAME OF RESP. ORG *Telekenex*

By: *Donna Pison*

Name

Title

Quality Assurance Manager

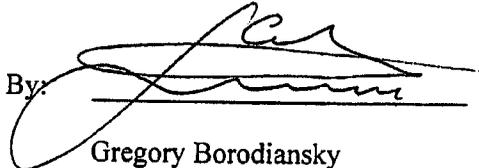
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Telengy, LLC is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Telengy, LLC

By: _____

A handwritten signature in black ink, appearing to read 'Gregory Borodiansky', is written over a horizontal line. The signature is stylized and cursive.

Gregory Borodiansky

CTO

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Telesean Inc is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Telesean Inc

By:



Stan Mosley
President

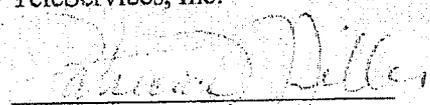
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that TeleServices, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

TeleServices, Inc.

By:



Patricia Miller
President

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that THE Telco (NBA01) is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

THE Telco

By:



Greg Fernandez
President

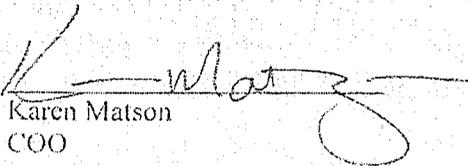
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Threshold Communications Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Threshold Communications Inc.

By:


Karen Matson
COO

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Unipoint Services(GHI01) is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Unipoint Services(GHI01)

By: 
Andrea Spisak
Provisioning Manager

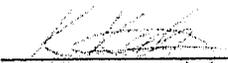
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that **VBI (fzf01)** is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

VBI (fzf01)

By:


Name **Kimberly Katz**
Title **Owner**

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [vCom Solutions] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

vCom Solutions

By: _____

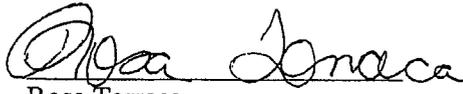

Kendis Pitelka
Service Delivery Provisioner

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Voce Telecom is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Voce Telecom

By: 
Rosa Torraca
Controller

May 3, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Volo, LLC. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Volo, LLC.

By:



Felipe Portocarrero
President

May 3, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that Voxbeam Telecommunications, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Voxbeam Telecommunications, Inc.

By: _____


Paul Cusack
CEO

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that VPT, INC. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Pctition for Relief.

VPT, INC.
By: 
Kerry Spradley
President

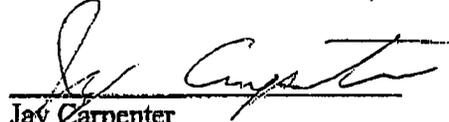
May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that WARNING Communications, Inc. is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

WARNING Communications, Inc.

By:

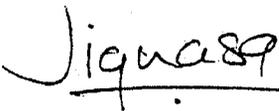

Jay Carpenter
President

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [Wiphonica Technologies Inc.] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

Wiphonica Technologies Inc.

By: 
Name: Jignasa Patel
Title : Principal

May 6, 2013

CERTIFICATION

The undersigned hereby states, under penalty of perjury, that [NAME OF RESP ORG] is a responsible organization, that it is a member of the 844 Release Coalition, and that it fully supports the foregoing Comments and Petition for Relief.

NAME OF RESP ORG

By:

Name

Title

May 6, 2013