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May 27, 2010

Via Email
Sharon Gillett
Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Release of 855 Toll-Free Code
CC Docket No. 95-155

Dear Ms. Gillett:

The Alliance for Telecommunications Industry Solutions' (ATIS), on behalf of its SMS/800 Number Administration Committee (SNAC), hereby provides its input regarding issues related to the planned release of the 855 Toll-Free Service Access Code (SAC). ATIS SNAC's input is extremely important given the notification from Database Service Management, Inc. (DSMI) regarding the impending shortage of Toll-Free numbers. ATIS SNAC has been working closely with DSMI to ensure the industry is prepared to support the new 855 SAC and urges the Commission to expeditiously release the new code and to adopt a plan to conserve Toll Free Numbers until the new code is available.

By way of background, ATIS is a global standards development and technical planning organization that develops and promotes global technical and operations standards for information, entertainment and communications technologies. ATIS SNAC, one of ATIS' 18 industry committees, identifies, develops and implements the resolution of issues impacting existing Toll-Free products and services and evolving technologies affecting future developments in the Toll-Free industry.

Expeditious Commission Action Is Needed. ATIS SNAC urges the Commission to act expeditiously to open the 855 code as soon as possible to address what DSMI has characterized as the "pending exhaust of the Toll-Free

number resource.”¹ As noted by DSMI, a February 2010 statistical analysis of data from August to January 31, 2010, indicates that the pool of Toll-Free numbers may be exhausted in the second quarter of 2014. Since the results of this study have been publicized, however, available Toll-Free numbers have been consumed at an alarming rate. Subsequent data now suggest that number exhaust may occur by January 2011, if not sooner. For example, during the week ending May 22, 2010, 330,585 toll free numbers, or 9.2% of the spare pool, were depleted.


Given the importance of this resource to the industry and the US economy, ATIS SNAC also urges the FCC to inform the industry of the anticipated schedule for the release of this new code so that it can undertake steps to ensure an orderly roll-out.

A Toll Free Number Allocation Plan Must be Implemented. Given the accelerating depletion of Toll Free Numbers and the uncertainty surrounding when complete exhaustion may occur, the industry also urges the Commission to implement interim measures to ensure that Toll Free Numbers remain available until the new code is available. Specifically, ATIS SNAC recommends that the Commission adopt a plan that would conserve all Toll Free Numbers until 855 numbers could be introduced.

ATIS SNAC would welcome the opportunity to discuss this matter with you.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Thomas Goode
ATIS General Counsel

¹ Correspondence from Michael J. Wade, President of DSMI, to Ann Stevens of the FCC Wireline Competition Bureau, April 6, 2010.