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October 30, 2015

Via Email
Ann Stevens (Ann.Stevens@fcc.gov)
Deputy Chief, Competition Policy Division Wireline
Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Methodology for Opening 833 and Future Toll Free Codes
CC Docket No. 95-155

Dear Ms. Stevens:

The Alliance for Telecommunications Industry Solutions (ATIS) SMS/800 Number Administration Committee (SNAC) is writing to express its support for a change in methodology for opening the Toll Free 833 NPA and future Toll Free code openings.

ATIS SNAC has been examining issues related to the availability of Toll Free numbers. As part of this work, ATIS SNAC: identified and reviewed the procedures associated with the most recent code opening; identified and evaluated alternatives to those procedures that would result in more efficient and fair code openings; identified recommendations that had consensus support of SNAC member companies; and provided information to, and solicited input from, the Resp Org community.

As a result of this work, SNAC has reached consensus agreement on the following recommendations:

- The decision regarding when to open a new Toll Free code should be based upon the expected number of months until code exhaustion, rather than upon the percentage of number of currently open codes in use.
- The date of the code opening, once set, should not be changed.
- Rationing rules should be developed by ATIS SNAC and SMS/800, Inc. that can be implemented when exhaust predictions based on the total number of spares remaining and the months until the code opening date indicate that number utilization is proceeding faster than expected.
- Each code opening should make only a single new Toll Free code available.
- During the first twenty (20) days of a new code opening, each Resp Org Company should be limited to reserving 100 numbers per day.
- The term "Resp Org Company" should be defined as to limit affiliated groups of Resp Orgs from obtaining any more than 100 number reservations per day per affiliated group. Resp Orgs should be required to file an affidavit with SMS/800, Inc. and the

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Commission indicating all affiliated entities; Resp Org Companies that fail to file this affidavit should be barred from reserving numbers from the new code for the initial 20-day period.

ATIS SNAC notes that a survey was sent to all Resp Orgs to confirm whether there was broad support for the last two issues. Approximately 20% of the 380 unaffiliated Resp Orgs responded. Of these 76 respondents:

- 89% (66 respondents) supported the SNAC-proposed limit of 100 reservations per day per affiliated group; and
- 78% (59 respondents) supported reducing the period of time during which Resp Orgs are limited to 100 numbers per day from the first thirty (30) days to the first twenty (20) days.

Given the support for these consensus-based recommendations, ATIS SNAC requests that the Commission incorporate these recommendations into the methodology to be used for the opening of 833 and for future Toll Free codes.

Please do not hesitate to contact us with any questions on this matter.



Thomas Goode
ATIS General Counsel

Cc: Michelle Sclater, Attorney Advisor, Wireline Competition Bureau
Heather Hendrickson, Attorney Advisor, Wireline Competition Bureau