

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Somos, Inc Petition for Waiver)	PS Docket 95-155
Of Section 52.111 of the)	
Commission’s Rules)	
)	

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) submits these comments on behalf of its SMS/800 Number Administration Committee (SNAC) in response to the *Public Notice* released April 9, 2016, in the above-referenced docket. In the *Public Notice*, the Federal Communications Commission (Commission) seeks input on a *Petition for Waiver – Expedited Action Requested* submitted by Somos, Inc. to seek a limited waiver of the “first-come first-served” rule governing the administration of Toll-Tree Numbers (TFNs).¹ As explained below, ATIS SNAC supports this petition and urges the Commission to grant a limited waiver of the Commission’s rules as requested by Somos.

ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. Nearly 600 industry subject matter experts work collaboratively in ATIS’ industry committees, such as ATIS SNAC.

¹ Petition for Waiver--Expedited Action Requested, filed March 21, 2016, by Somos, Inc.

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. ATIS SNAC also maintains the Industry Guidelines for Toll Free Number Administration and is a leader in developing standards and procedures for the interaction between Responsible Organizations (“RespOrgs”), Customers, and Service Providers.

ATIS SNAC supports Somos’ request for a limited waiver. As explained in the petition, recently a number of TFNs were returned to the spare pool, including approximately 96,000 TFNs in the 800 code.² ATIS SNAC agrees with Somos that there is “widespread and intense interest” in 800 numbers that would warrant a limited release of these numbers to ensure the equitable distribution of TFNs. ATIS therefore supports Somos’ request for a limited temporary waiver of Section 52.111³ of the rules to permit Somos to use an allocation method whereby each Resp Org could obtain up to one hundred (100) TFNs in the 800 code each day during the five-day allocation period. ATIS SNAC further supports Somos’ intent to: (1) release any 800 numbers not allocated during this five-day period using ordinary sparing methodology; and (2) begin the limited allocation on Monday, June 6.

² Somos, Inc. Petition for Waiver at p. 2.

³ 47 C.F.R. 52.111. “Toll free numbers shall be made available on a first-come, first-served basis unless otherwise directed by the Commission.”

ATIS SNAC supports the *Petition for Waiver – Expedited Action Requested*. Granting a limited waiver of the rules as requested by Somos is an appropriate way to deal with the large number of TFNs in the 800 code and would result in a wider and fairer distribution than a “first-come, first-served” arrangement.

Respectfully submitted,

Thomas Goode
General Counsel
Alliance for Telecommunications Industry
Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 628-6380

April 21, 2016