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February 3, 2017

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ATIS Petition Requesting Bureau Action to Revise Toll-Free Code Opening Methodology,
CC Docket No. 95-155

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS) on behalf of its 800 Service Management System Number Administration Committee (SNAC) is writing to express its support for Somos, Inc.'s proposed modification to the above-referenced April 5, 2016, ATIS SNAC petition requesting revision to the current Toll-Free Code Opening Methodology.

In its petition, ATIS SNAC recommended that the Bureau adopt a 20-day deviation from the usual first-come, first-served methodology upon opening of future toll-free codes, as permitted by the Commission's rules. Specifically, SNAC recommended that the Bureau limit each "RespOrg Group" to reserving 100 toll-free numbers per day in a newly-opened code for each of the first 20 days beginning with the code opening date. To effectuate this rule change, ATIS SNAC recommended that no later than 30 days before a new toll-free code opening date, each RespOrg be required to file an affidavit with the toll-free number administrator, and a copy with the Commission, identifying all other RespOrgs with which it is affiliated.

Somos proposes an alternative methodology to determine affiliation that would not require it to obtain new or additional information from RespOrgs or to obtain and store RespOrg affidavits detailing any affiliations. Instead, Somos proposes that "affiliation" be identified using information it already has on-hand. The information already available to Somos for this purpose includes: corporate name; primary contact name, address, phone and email; billing contact name, address, phone and email; and executive contact. Somos would review its records, make a preliminary determination of affiliation and communicate with those RespOrgs that have been determined to be affiliates. If there are any discrepancies, the RespOrg and Somos would work cooperatively to resolve them.

ATIS SNAC supports Somos' alternative, less burdensome approach for identifying affiliated RespOrgs for the purpose of effectuating ATIS SNAC's recommended per-day limit for the first 20 days of new code openings. In accordance with the NANPA Planning Letter PL- 481 (attached), ATIS asks that the Commission issue its order for the NPA 833 as soon as possible in order for the code to be opened on April 22, 2017.

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, with the first name "Thomas" being more prominent than the last name "Goode".

Thomas Goode
ATIS General Counsel

cc: Kris Monteith, Wireline Competition Bureau, Acting Bureau Chief
Ann Stevens, Wireline Competition Bureau, Deputy Division Chief
Sanford Williams, Wireline Competition Bureau, Deputy Division Chief
Michelle Sclater, Wireline Competition Bureau, Attorney Advisor
Heather Hendrickson, Wireline Competition Bureau, Attorney Advisor

Number: PL-481
Date: April 15, 2015
Subject: Implementation of the NPA 833 for Toll-Free Services
Related Previous Planning Letters: None

In February 2000, the Industry Numbering Committee directed NANPA to assign the 833 and 822 NPA codes for toll-free service (see Planning Letter 214).

A March 2015 analysis of the toll-free resource conducted by 800/SMS, Inc. projected the current toll-free resource will reach 90% exhaust in 1Q16, and 95% exhaust in the 1Q17. Based upon this information, 800/SMS, Inc. recommends the FCC consider opening the 833 NPA on or about April 22, 2017.

Information pertaining to the exhaust of toll-free resources can be found on the NANPA website (www.nanpa.com) under Reports, NRUF.

A subsequent Planning Letter will be issued when an implementation schedule is determined.

General questions regarding this planning letter should be directed to John Manning, Senior Director, NANPA on 571-434-5770.