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November 18, 2022

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Re: *Ex Parte Notice* – Distribution for Toll-Free Numbers (TFNs) Made Unavailable at the Direction of the Commission
Ex Parte Notification -- WC Docket No. 17-192, CC Docket No. 95-155

Dear Ms. Dortch:

On November 16, 2022, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) SMS/800 Number Administration Committee (SNAC) met virtually with Ramesh Nagarajan, Legal Advisor for Wireline and Enforcement for Chairwoman Rosenworcel, to discuss ATIS SNAC's request for guidance regarding the distribution for Toll-Free Numbers (TFNs) that have been made unavailable at the direction of the Federal Communications Commission (Commission).

The following representatives from ATIS SNAC were present at this meeting: Michael Gilbert ATIS SNAC Co-Chair, iconectiv; Joel Bernstein, Vice President, Regulatory and Public Policy, Somos; Jackie Wohlgemuth, Director of Global Standards Development, ATIS; Drew Greco, Coordinator, ATIS; and Thomas Goode, General Counsel, ATIS.

ATIS SNAC noted that, as explained in its June 28, 2022, ex parte in the above-referenced dockets, there are over 45,000 TFNs that have not been allocated. These unallocated TFNs, include over 30,000 "833" TFNs and nearly 16,000 "800" TFNs. ATIS SNAC requests Commission guidance regarding the allocation of the "833" TFNs. Given the anticipated demand for the "800" numbers, ATIS also recommends that the Commission consider an equitable allocation method under which the unassigned "800" TFNs would be made eligible for allocation but with an allocation limit of 125 numbers per Resp Org (with all affiliates counted as a single Resp Org).

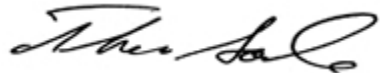
ATIS SNAC explained that the allocation methodology it has proposed for the unallocated "800" TFNs has been used effectively for other toll-free code openings.¹ This methodology also facilitates the equitable allocation of this resource. While there are other ways that could be used

¹ For example, the FCC established for the "855" toll free code opening a limit of one hundred "855" numbers per day per RespOrg for the first 30 days. *Order*, CC Docket No. 95-155 (released September 10, 2010).

to allocate these TFNs (competitive bidding, lottery, etc.), ATIS SNAC believes that its proposal is more effective and can be implemented more quickly.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically submitted into the record of this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

Thomas Goode
ATIS General Counsel

Cc: David Greenhaus, 800 Response Information Services LLC, ATIS SNAC Co-Chair
Michael Gilbert, iconectiv, ATIS SNAC Co-Chair
Joel Bernstein, Vice President, Regulatory and Public Policy, Somos
Pamela Arluk, Division Chief, Competition Policy Division, Wireline Competition
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Heather Hendrickson, Deputy Division Chief, Competition Policy Division, Wireline
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