

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

In the Matter of	)	
	)	
Text-Enabled Toll Free Numbers	)	WC Docket No. 18-28
	)	
Toll Free Service Access Codes	)	CC Docket No. 95-155
	)	

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Notice of Proposed Rulemaking (NPRM)* released June 12, 2018, in the above-referenced dockets. In its comments, ATIS makes recommendations regarding toll free texting and the roles of toll free Subscribers, Resp Orgs and messaging providers in managing and updating information on text-enabled toll free numbers in an industry database.

**I. BACKGROUND**

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the

Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS SNAC resolves issues impacting existing toll free products and services and evolving technologies affecting the future of the toll free industry. SNAC is made up of members representing providers and users of the 800 Service Management System (SMS/800). For more than two decades, SNAC has been the voice of the Resp Org community. It provides recommendations to the owner/manager of the SMS/800 regarding design and management issues that have a direct effect on the system users. SNAC maintains the *Industry Guidelines for Toll Free Number Administration*,<sup>1</sup> and is a leader in developing standards and procedures for the interaction between Resp Orgs, Customers, and Service Providers.

## **II. COMMENTS**

In the *NPRM*, the Commission seeks input regarding how to implement its decision in the *Declaratory Ruling* in this proceeding that only a toll free subscriber may authorize the text-enabling of a toll free number. The Commission proposes to require a subscriber to inform its Resp Org of its authorization to text-enable its toll free number before texting is enabled.<sup>2</sup> ATIS SNAC supports this Commission proposal, noting that it will address concerns previously raised by SNAC over the very real possibility that toll free numbers could be text-enabled without the

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<sup>1</sup> Available from the ATIS Document Center at <https://www.atis.org/docstore/product.aspx?id=26088>.

<sup>2</sup> *NPRM* at ¶14.

express authorization of the Subscriber and the validation by their Resp Org.<sup>3</sup> ATIS SNAC believes that the messaging provider should also have a significant role in the process and should, in fact, be the entity required to notify the Resp Org via the texting registry provider of the Subscriber's intention, in order to authenticate the Subscriber's request.<sup>4</sup>

The Commission also proposes to require Resp Orgs to indicate in an industry database whether a number has been text-enabled and to update this information should its Subscriber choose to no longer text-enable the number.<sup>5</sup> ATIS SNAC supports this proposal. Requiring Resp Orgs to update the database to reflect the wishes of toll free Subscribers is appropriate and falls within the established responsibility of Resp Orgs to manage and administer records in the SMS Database for the toll free Subscriber. Moreover, because there is no industry database of service Subscribers, the Resp Org is the appropriate entity to determine/authenticate its users.

The Commission also seeks comment on whether a separate registry be established solely to manage toll free text messaging and, if so, should the Texting and Smart Services Registry (TSS Registry) be used for this purpose.<sup>6</sup> ATIS SNAC supports the inclusion of information on toll free texting-enabling authorizations in the existing Toll Free Numbering Administrator's (TFNA) SMS/800 Registry. ATIS SNAC supports the use of the SMS/800 Registry, noting that the TFNA has both the required expertise and neutrality to maintain and make available this information. Use of this existing registry will also make it feasible for entities to indicate within

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<sup>3</sup> ATIS SNAC *ex parte*, filed December 21, 2016, in CC Docket No. 95-155 (expressing support for the Texting and Smart Services Registry and for toll free Subscribers, through their Resp Orgs, to specifically authorize any implementation of multimedia services for their toll free numbers).

<sup>4</sup> ATIS SNAC believes that the same rules should apply to the enablement of all multimedia services using toll free numbers as an identifier, including texting.

<sup>5</sup> *NPRM* at ¶14.

<sup>6</sup> *NPRM* at ¶18, 21.

the database all numbers previously text-enabled within six months of the effective date of the new rules, as proposed in the *NPRM*.<sup>7</sup>

If a new registry is warranted, the Commission asks whether it should consider establishing a single registry or multiple registries.<sup>8</sup> ATIS SNAC supports the establishment of a single registry with a single set of guidelines and rules. From a technical implementation perspective, a single registry would be simpler and more efficient than the establishment of a multiple registries. To the extent that there is only one database, SNAC believes it should be operated by a neutral TFNA under a cost-recovery model and may be included in a tariff similar to the SMS/800 tariff.<sup>9</sup>

In the *NPRM*, the Commission seeks input on what information should be captured and maintained to avoid confusion and to prevent potential abuse beyond the Subscriber's text-enablement authorization.<sup>10</sup> ATIS SNAC believes that the name and contact information for the messaging provider should also be included in the database. ATIS SNAC believes that there is consensus within the industry that Subscriber information should not be required to be captured in the database.

The approach outlined above by ATIS SNAC for the text-enablement of toll free numbers is consistent with the *Industry Guidelines for Toll Free Number Administration*.<sup>11</sup> As explained in the guidelines, companies that offer text messaging capability on Toll Free Numbers (called Service Registrars) can enable and set up routing in the TSS Registry as authorized by

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<sup>7</sup> *NPRM* at ¶22.

<sup>8</sup> *NPRM* at ¶19.

<sup>9</sup> Somos, a not-for-profit entity, provides the SMS/800 Registry under an annual cost-recovery tariff.

<sup>10</sup> *NPRM* at ¶17.

<sup>11</sup> *Industry Guidelines for Toll Free Number Administration* (ATIS-0417001-003), April 2017. This document is available from the ATIS Document Center at <https://www.atis.org/docstore/product.aspx?id=26088>.

their Subscribers.<sup>12</sup> The TSS Registry then confirms that the toll free number is in Assigned or Working Status (not unassigned or otherwise unavailable) through query of the SMS/800 Registry and notifies the provider of voice-based services (known as the Resp Org) that a request to text-enable the toll free number has been received. The guidelines further state that Resp Orgs have two full business days to accept or reject the request and note that Resp Orgs should only reject requests for legitimate business reasons, such as if the Toll Free Subscriber has not authorized the Service Registrar to text-enable their Toll Free Number. Once the enablement request is authorized by the Resp Org, the TSS Registry distributes the routing information to the messaging ecosystem. Finally, the guidelines state that, once a number has been released to Spare by a Resp Org, the number will automatically revert to that of non-text enabled.

### **III. CONCLUSION**

ATIS appreciates the opportunity to provide its input to the *NPRM* and urges the Commission to consider the recommendations above.

Respectfully submitted,



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<sup>12</sup> In order to authorize text enablement within the TSS Registry, the following information is required: toll free number, business name, contact name, contact job title, contact phone and contact email.