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May 9, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-155
Ex Parte Presentation

Dear Ms. Dortch:

On May 6, 2011, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) SMS/800 Number Administration Committee (SNAC) held a call with representatives from the Federal Communications Commission's (Commission) Wireline Competition Bureau (WCB). The purpose of this call was to discuss issues pertaining to the transference of toll free numbers.

ATIS SNAC noted that, in a recent Declaratory Ruling, the Commission states that Resp Orgs may not transfer toll free numbers directly from one entity to another unless the Commission directs otherwise.¹ The Commission further explains that it has only directed otherwise in extraordinary circumstances involving public safety.

ATIS SNAC noted that, while it supports this ruling, there are specific situations under which the industry should be allowed to continue to perform direct transfers of numbers, including: (1) advertising misprints; (2) order entry errors; (3) mergers and acquisitions; (4) sale of a businesses; (5) rectify situations involving fraudulent or unauthorized transfers of numbers; and (6) specific court orders. ATIS SNAC noted that Sections 2.2 and 2.3 of the Industry Guidelines for Toll Free Number Administration (ATIS/OBF-TFG-013) specifically address the issue of direct transfers of toll free numbers.

The following representatives from the WCB were present at the meeting: Ann Stevens, Deputy Chief, Competition Policy Division; Michelle Sclater, Attorney Advisor; and Heather Hendrickson, Attorney Advisor.

¹See *Declaratory Ruling*, DA 11-355, CC Docket No. 95-155 (rel. Feb. 24, 2011).

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Attending on behalf of the ATIS SNAC were: SNAC Co-Chair David Greenhaus, Director of Regulatory Affairs, 800 Response Information Services; SNAC Co-Chair Jon Durst, Manager, Verizon Business; and Thomas Goode, General Counsel, ATIS.

Pursuant to the Commission's rules, one copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceedings.

Sincerely,

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

Thomas Goode

cc: Ann Stevens

Michelle Sclater

Heather Hendrickson