

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

In the Matter of	)	
	)	WC Docket No. 20-174
iconectiv Petition for Competitive	)	WC Docket No. 17-192
Procurement of the Toll-Free	)	CC Docket No. 95-155
Numbering Administrator	)	

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Public Notice* released June 29, 2020, in the above-referenced dockets. In the *Public Notice*, the Federal Communications Commission’s Wireline Competition Bureau (Bureau) seeks comment on a petition filed by iconectiv, LLC requesting that the Commission implement a competitive procurement process to select the Toll Free Numbering Administrator (TFNA).<sup>1</sup> As a key developer of industry numbering-related standards and guidelines, including the industry toll-free guidelines, ATIS is pleased to have the opportunity to respond to the comments in this proceeding.

**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

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<sup>1</sup> *Petition of iconectiv, LLC for Competitive Procurement of the Toll Free Numbering Administrator Role*, WC Docket No. 17-192, CC Docket No. 95-155 (filed Jun. 11, 2020) at p. 2.

stakeholders from the Information and Communications Technologies (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, VoIP providers, 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.

Industry subject matter experts work collaboratively in ATIS’ open industry committees and incubator solutions programs, including ATIS’ SMS/800 Number Administration Committee (SNAC). 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).

## **II. COMMENTS**

In its petition, iconectiv requests that the Commission implement a competitive procurement process to select the TFNA that would allow the competitive market to determine the cost of toll free administration by awarding the TFNA role and setting the price for toll free administration via a competitive procurement.<sup>2</sup>

ATIS SNAC does not object to the competitive concept behind the proposed use of a competitive procurement process to select the TFNA. However, regardless of how the role of the TFNA is selected, ATIS SNAC urges the Commission to take steps to ensure that any changes to the TFNA will not negatively impact toll free providers and end users. In particular,

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<sup>2</sup> iconectiv petition at p. 10.

ATIS SNAC urges the Commission to ensure that any new rules do not significantly interfere with or require changes to the way in which providers interface with the TFNA and allows service providers to maintain existing levels of service, security, functionality, and does not require costly changes.

ATIS is dedicated to the principles of competition and ATIS SNAC is committed to continuing to support the TFNA, however it is selected. ATIS SNAC provides a forum for stakeholders to discuss toll free issues and to provide recommendations to the TFNA. ATIS SNAC also maintains the *Industry Guidelines for Toll Free Number Administration* and develops standards and procedures for the interaction between Resp Orgs, Customers, and Service Providers. ATIS SNAC has been successfully working with the current TFNA for five years to resolve industry issues. During this time, ATIS SNAC has provided important input and guidance about key issues affecting the TFNA. For example, SNAC requested that the TFNA create a special Resp Org Change (ROC) system to standardize ROC requests and retain the Letter of Authorization (LOA) information for a period of seven years. This input has resulted in significant improvements to TFNA processes and a dramatic decrease in the number of ROC requests needing TFNA assistance.<sup>3</sup> This is but one example of the positive changes that SNAC has recommended to and collaborated with the TFNA to allow the toll free industry to grow and evolve. ATIS SNAC looks forward to continuing to work with the TFNA, regardless of how it is selected, in a similar role to ensure that important industry guidance and input is provided.

ATIS' role with regard to toll free numbers is similar to the role it plays in providing industry input and oversight of other key industry numbering resources. ATIS Industry

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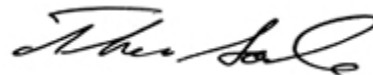
<sup>3</sup> Somos, the TFNA, has noted that the SNAC input and guidance has resulted in an 80% decrease in the number of requests requiring assistance - from 5,735 in the 2016 Tariff Year to 1,021 in the 2019 Tariff Year.

Numbering Committee addresses and develops solutions for numbering issues and has published a number of public industry resources on the topics of planning, administration, allocation, assignment, and use of NANP numbering resources within the NANP area.<sup>4</sup> ATIS' IMSI Oversight Counsel (IOC) oversees the management of the administrator and IMSI codes – the critical 15-digit number used within mobile phones that allows service operators to identify mobile terminals for purposes of international roaming – that have been assigned to the United States and its possessions as authorized by the U.S. Department of State since 1996. The IOC provides industry oversight and management of this key industry resource and maintains the assignment and management guidelines for IMSIs.<sup>5</sup> To this end and given its deep experience, ATIS stands ready to continue to play a central role in providing industry input and guidance related to management of toll free resources and to support the oversight of the TFNA.

### III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Public Notice*.

Respectfully submitted,



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<sup>4</sup> A full listing of documents is available from [https://www.atis.org/01\\_committ\\_forums/INC/documents/](https://www.atis.org/01_committ_forums/INC/documents/).

<sup>5</sup> For more information, please see [https://www.atis.org/01\\_committ\\_forums/ioc/imsi/](https://www.atis.org/01_committ_forums/ioc/imsi/).