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January 26, 2023

VIA ELECTRONIC FILING

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Ex Parte, CC Docket Nos. 95-155, 96-115

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its SMS/800 Number Administration Committee (SNAC), is writing in support of the recent ex parte filings by 800 Response Information Services (800RIS) regarding the request for Network Location Information for the purpose of accurately routing Toll-Free calls. ATIS SNAC agrees that accurate and timely Network Location Information is critical to the routing, billing, and proper completion of Toll-Free calls and supports efforts to ensure that this information is available to Toll Free Service Providers (TFSP) to accurately and properly route, bill, and complete Toll-Free calls.

ATIS is a global standards development and technical planning organization that develops technical and operations standards for the information and communications technologies (ICT) industry. ATIS' diverse membership includes key stakeholders – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, VoIP providers, consumer electronics companies, public safety agencies, and internet service providers. Industry subject matter experts work collaboratively in ATIS' open industry committees.

ATIS SNAC identifies, develops, and implements the resolution of issues impacting existing Toll-free products and services within the Toll-Free industry and respectfully asks the Bureaus to move forward with guidance that will ensure the proper routing and terminating of Toll-Free calls without unnecessary interruption in the call flow. (e.g., opt-in/opt-out requirements, or zip code entry).

ATIS SNAC notes that the use of geographic routing is critical in addressing the business needs of Toll-Free subscribers. TFSPs must know callers' approximate locations to properly route such calls.<sup>1</sup> With the increased use of mobile phones, TFSPs could no longer approximate callers' locations via their NPA-NXX and came to rely on network location received out-of-band from the mobile providers via an aggregator. However, given concerns regarding Location-Based

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<sup>1</sup> In 2015, the North American Numbering Council's Future of Numbering Working Group released a white paper titled "Geographic Routing of Toll-free Services" that brought to the fore the critical role that location plays in determining the proper termination point for inherently non-geographic Toll-Free numbers.

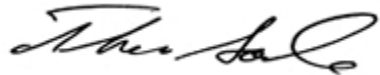
Service Providers' (LBSPs) misuse of the data, wireless carriers in 2018 blocked access to location information even for the routing of Toll-Free calls.<sup>2</sup>

In the spring and summer of 2019 and in late 2022, 800RIS and others had a series of meetings with FCC staff.<sup>3</sup> During these meetings, the distinction between TFSP's use of cell tower network location information and LBSP's use of device location information was explained, as was the need for Network Location Data for proper call completion and optimal consumer experience.

ATIS supports these efforts to ensure that accurate and timely Network Location Information is available to TFSPs to accurately and properly route, bill, and complete Toll-Free calls. ATIS agrees that the use of Network Location Information by TFSPs is consistent with the Commission's established rules, as well as the provisions of the Communications Act.

If you have any questions regarding this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,



Thomas Goode  
ATIS General Counsel

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<sup>2</sup> In late 2018, in response to reports regarding LBSPs' misuse of handset location data, mobile carriers effectively denied access to all location data to TFSPs and LBSPs.

<sup>3</sup> On April 5, 2019, Heather Barrows of 800RIS, Bruno Tabbi of Ignition Toll Free, and Noah Rafalko of MessageComm, met (via telephonic bridge) with Nirali Patel, Wireline Advisor to then-Chairman Pai. On May 28, 2019, Bruno Tabbi of Ignition Toll Free and Noah Rafalko of MessageComm, met (via telephonic bridge) with Arielle Roth, Legal Advisor to Commissioner Michael O'Rielly. On June 7, 2019, Bruno Tabbi of Ignition Toll Free, Noah Rafalko of MessageComm, and David Greenhaus and John Evancie of 800 Response Information Services LLC met (via telephonic bridge) with Travis Litman, Chief of Staff to then-Commissioner Jessica Rosenworcel. On June 13, 2019, Bruno Tabbi of Ignition Toll Free, Noah Rafalko of MessageComm, and John Evancie of 800RIS met (via telephonic bridge) with Randy Clarke, Acting Legal Advisor, Wireline and Public Safety for the office of Commissioner Geoffrey Starks. On June 20, 2019, Bruno Tabbi of Ignition Toll Free, Noah Rafalko of MessageComm, and John Evancie of 800RIS met (via telephonic bridge) with Jamie Susskind, Chief of Staff to Commissioner Brendan Carr. On November 3, 2022, John Evancie and Heather Barrows of 800RIS, and Bruno Tabbi of Ignition Toll Free met (via video conference) with Ethan Lucarelli, Legal Advisor for Wireless and International Issues, and Ramesh Nagarajan, Legal Advisor for Wireline and Enforcement, both of Chairwoman Rosenworcel's office. On November 28, 2022, John Evancie and Heather Barrows of 800RIS, and Bruno Tabbi of Ignition Toll Free met (via video conference) with Keith Buell - Attorney Advisor, Garnet Hanly - Chief, Competition & Infrastructure Policy Division, Kari Hicks - Associate Bureau Chief, Susannah Larson - Deputy Chief, John Lockman - Legal/Policy Advisor, the Wireless Telecommunications Bureau, and Heather Hendrickson - Deputy Chief and Christi Shewman - Special Counsel, both of the Wireline Competition Bureau's Competition Policy Division.

cc: (via email)

Ethan Lucarelli – Legal Advisor for Wireless and International Issues

Ramesh Nagarajan – Legal Advisor for Wireline and Enforcement

Keith Buell – Attorney Advisor, Wireless Telecommunications Bureau

Garnet Hanly – Chief, Competition & Infrastructure Policy Division, Wireless Telecommunications Bureau

Heather Hendrickson – Deputy Chief, Competition Policy Division, Wireline Competition Bureau

Kari Hicks – Associate Bureau Chief, Wireless Telecommunications Bureau

Susannah Larson – Deputy Chief, Wireless Telecommunications Bureau

John Lockman – Legal/Policy Advisor, Wireless Telecommunications Bureau

Christi Shewman – Special Counsel, Competition Policy Division, Wireline Competition Bureau

Danielle Thumann – Legal Advisor to Commissioner Carr

Greg Watson – Policy Advisor to Commissioner Carr

Justin Faulb – Chief of Staff and Wireline and National Security Advisor for Commissioner Starks

Shiva Goel – Legal Advisor to Commissioner Starks)

Erin Boone – Chief of Staff and Wireless Advisor for Commissioner Simmington

Marco Peraza – Legal Advisor to Commissioner Simmington