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September 23, 2025

Via Email
Joseph Calascione
Bureau Chief, Wireline Competition Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: Assignment of Toll-Free Numbers in the 833 NPA
Ex Parte Notification -- WC Docket No. 17-192, CC Docket No. 95-155**

Dear Chief Calascione:

The Alliance for Telecommunications Industry Solutions (ATIS) SMS/800 Numbering Administration Committee (SNAC) is writing to urge the Federal Communications Commission (Commission) to move expeditiously to allow the distribution of certain Toll-Free Numbers (TFNs) in the 833 and 800 area codes that have been made unavailable at the direction of the Commission. ATIS SNAC urges the Commission to allocate these TFMs consistent with the recommendations of the Commission's North American Numbering Council (NANC).

ATIS SNAC initially brought this matter to the attention of the Commission in June 2022, asking the Commission to permit Somos, the Toll-Free Number Administrator (TFNA), to release these TFNs and proposing allocation methodology. Subsequently, the Commission referred ATIS' request and recommendations to the North American Numbering Council (NANC), which created the Toll-Free Utilization of Numbers (T-FUN) Working Group to examine this matter. The T-FUN Working Group issued two reports and recommendations, both of which supported SNAC's recommendations regarding the allocation of these TFNs.

833 TFNs. In its *Report and Recommendations regarding Potential Assignment Methods for the Remaining 8YY numbers that Remain Unassigned from the 2019 Auction*, approved by the NANC at its March 1, 2024, meeting, agreed with the SNAC recommendations to allow the 15,978 TFNs in the 833 NPA that were subject to the 833 Auction but received no bids to be placed into the spare pool and reserved by any RespOrg wishing one of the numbers on the usual first come, first serve basis. Given that the 833 auctions were established via a Commission *Report and Order*,¹ ATIS believes that action by the Commission via rulemaking or public notice is necessary and would welcome the Bureau's support for such action.

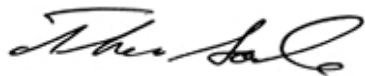
¹ In the Matter of Toll-Free Assignment Modernization, Toll Free Service Codes Report and Order, WC Docket No. 17-192 and CC Docket No. 95-155, released September 27, 2018.

800 TFNs. In its *Report and Recommendations on the Assessment of Unassigned 800-Prefix Toll Free Numbers and Potential Methods for Number Assignment*, approved by the NANC at its June 25, 2024, meeting, the Working Group notes that its recommendations “align with the conclusions proposed by the ATIS SNAC [in its June 2022 letter]” that an equitable allocation method be established under which the unassigned 800 TFNs would be made eligible for allocation but with a per RespOrg allocation limit. As explained in ATIS’ June 2022 letter and support by the T-FUN Working Group, the easiest and least expensive way to accomplish this would be to apply the limit to the RespOrgs for one day. After the one-day allocation limit ends, the remaining 800 numbers would be placed back into the spare pool and would be available to all RespOrgs, and the allocation limits would be restored to their previous limits. ATIS SNAC believes that the Bureau has the authority to direct the TFNA to make these TFNs available consistent with the NANC’s recommendations on this matter, and we urge the Bureau to take this action.

ATIS SNAC asks that the Commission implement the NANC’s recommendations regarding these TFNs as soon as possible. Allocating these TFNs will benefit U.S. telecommunications companies, RespOrgs, and their customers.

If you have any questions, please do not hesitate to contact me.

Sincerely,

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

Thomas Goode
General Counsel
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