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August 19, 2015

Via Email
Ann Stevens (Ann.Stevens@fcc.gov)
Deputy Chief, Competition Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Toll Free Texting and Smart Services Registry

Dear Ms. Stevens:

The Alliance for Telecommunications Industry Solutions (ATIS) SMS/800 Number Administration Committee (SNAC) is writing to express its support for the Texting and Smart Services Registry being deployed by SMS/800 and the associated guidelines developed by CTIA – The Wireless Association™.

As one of the leading voices for the toll-free Resp Org community, ATIS SNAC believes that enabling texting and other multimedia services for toll-free numbers will benefit toll-free subscribers and other consumers. ATIS SNAC notes that the development and deployment of the Texting & Smart Services Registry and guidelines are important steps to ensuring consistent, appropriate implementation of toll-free texting.

While ATIS supports the Registry, it is concerned that toll-free numbers may be text-enabled without the express permission of the Resp Org (as the agent of the toll-free subscriber) particularly by industry participants that choose not to use the Registry. It is very important that toll-free subscribers, through their Resp Orgs, specifically authorize any implementation of multimedia services for their toll-free numbers so that they are prepared to support these multimedia services. To this end, ATIS SNAC recommends the Commission promote the use of the Registry to ensure that all text-enabled toll-free numbers are entered into the Registry.

If there are any questions, please do not hesitate to contact the undersigned.

Sincerely,

Thomas Goode
ATIS General Counsel

Cc: Michelle Sclater, Attorney Advisor, Wireline Competition Bureau
Heather Hendrickson, Attorney Advisor, Wireline Competition Bureau