Ex Parte VIA ECFS

March 29, 2013

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

Re: In the matter of EX PARTE MEETINGS WITH THE TECHNOLOGY TRANSITIONS POLICY TASK FORCE; GN Docket No. 13-5;
In the matter of A NATIONAL BROADBAND PLAN FOR OUR FUTURE; WC Docket No. 09-51;
In the matter of PETITIONS FOR WAIVER OF COMMISSION’S RULES REGARDING ACCESS TO NUMBERING RESOURCES, CC Docket No. 99-200

Dear Ms. Dortch:

The FCC has proposed as part of its Technology Transitions Policy Task Force, to modernize the Commission’s policies in a manner that encourages the technological transition, empowers and protects consumers, promotes competition, and ensures network resiliency and reliability. MediaFriends Inc. believes through industry evolution and its innovation of telecommunications based on IP(Internet Protocol) technology and business models, it has exemplified the spirit and provided a showcase for the embodiment of the FCC’s directions.

MediaFriends has developed and offers products to consumers and businesses based on IP technology which provides SMS(Short Message Service) enablement of fixed line DID’s(Direct Inward Dialing in reference to the North American Numbering Plan numbers, aka ‘telephone numbers’) that does not interfere with the voice based functions of the fixed line DID, regardless of whether the voice functions are legacy Circuit Switched or VoIP(Voice over Internet Protocol) based, for mobile messaging functionality.

Aside from the IP SMS technology innovation, MediaFriends’ invention facilitates & validates models of enabling multiple services from different sources for a DID, as opposed to legacy models where 100% of all services associated with a DID were sourced from the entity that supplies the DID and consumers and businesses were limited in choices.

The SMS enablement of fixed line DID’s enables and adds the ability of using one’s fixed line DID for mobile messaging type functions of SMS and MMS(Multimedia Message Service), and because of the use of IP technology, additional functions previously unavailable with legacy PSTN(Public Switched Telephone Network) platforms, functions such as presence, graphics, contact book, multi-media association, auto-response and virtually seamless intercommunication
with other IP based messaging communications including private community systems such as those from Facebook, Twitter and various instant messaging communities can be federated into a unified communications experience. These experiences are further enhanced though use of cloud technologies that enable people to use their mobile messaging amongst any and all their devices (smartphone, PC(Personal Computer), tablet, eReader, etc.) anywhere in the world due to the use of IP as the technology foundation, since all one needs is Internet access, as opposed to the legacy model of a single device for mobile messaging.

The enabling of feature-rich SMS for fixed line DID completes the goal of unified communications by adding the functional elements of what has been traditionally provided by mobile DID’s: mobile messaging in the form of SMS, and by extension, MMS. It enables businesses and consumers the freedom to choose what services to associate with their DID.

This further provides a model by which multiple service providers can provide both legacy and future services associated with a DID versus today, in which consumers & businesses are limited to receiving all services provided by a single service provider. Traditionally, it has always been the provider of the DID itself for all services associated with it. Our invention has validated that having multiple service providers associated to a DID is possible. It does not interfere with the providers of other services associated with the DID. It offers only choice on a service by service basis and thereby negates the arguments often cited as concerns of enabling such capabilities.

Enabling multiple providers of services associated with a fixed line DID is analogous to how an Internet domain name (e.g. – sample.com) can have multiple providers of the various functions and services associated with the domain name such as website, email, blogs, RSS(Really Simple Syndication), etc. The domain name is an electronic ‘address’ assigned to a particular person or corporate entity by which they can select and choose amongst an almost infinite number of providers of different services.

By enabling new capabilities and multiple providers of services associated with fixed line DID’s, it provides a competitive environment that fosters innovation, competition and expansion of the communications ecosystem in ways never imagined, as well as blurring of the separation between the legacy PSTN and the Internet.

These new fledgling capabilities, which are in its infancy, create new and competitive opportunities that greatly benefit the consumer and businesses through the introduction of capabilities previously unavailable, spur new development across hardware, software & services, and serves the public interest.

It is in the interests of the industry and the FCC to ensure innovation, competition and expansion of the communications ecosystem is not stifled or impeded by artificial arguments for maintaining legacy models or through denial of DID access, which would stifle innovation, by
entities that may have been the original registrar, that are ultimately the property of the country’s citizens and no corporate entity.

MediaFriends has devoted enormous intellectual capital, financial resources and industry education into development of its technology and resultant products. It has expressed its willingness to provide additional information that would assist the FCC in this regard.

Pursuant to the Commission’s rules, this notice is being filed for inclusion in the public record. Please contact me should you have any questions.

Regards,

Gene Lew
Chief Technology Officer for MediaFriends, Inc.