

DESCRIPTION AND JUSTIFICATION

1.0 Introduction and Description of Filing

In this tariff filing, scheduled to become effective February 20, 2018, Somos, Inc. (hereinafter referred to as “Company”) proposes the following changes to Tariff F.C.C. No. 1, 800 Service Management System (SMS/800) Functions (SMS/800 Tariff): change name of the system from SMS/800 to SMS/800 TFN Registry, addition of system interfaces, updates to security requirements, modification of Resp Org deposit requirements, language to allow for the use of proprietary data to fight fraud and abuse, and an update to the dates and version numbers for technical references to be available as of the filing date. The proposed modifications are detailed below.

1.1 Modify Regulations and Service Offerings

- Proposing a change to the name of the system from SMS/800 to Toll-Free Number Registry (TFN Registry). This change affects nearly each page, including the title page.
- Table of Contents, pages 2 through 6, modifications reflect name change as well as new lines for added abbreviations and sections for new interfaces (API and GUI) and page number changes.
- Added abbreviations for API, GUI and TFN Registry on pages 8 and 9.
- On pages 10 and 11
 - Update the titles, issue numbers and dates for certain Technical Publications. Add new technical publications for TFN Registry and the API User Guides. All publications are available as of the filing date for this tariff.
 - Add the October 31, 2018 discontinuation date for the 3270 interface. Customers have been notified of this anticipated change.
- Section 2.1.2(B), add “except as determined by the Federal Communications Commission.” to the first-come, first-served requirement providing a caveat for the FCC to modify it as they have in the past for code openings, and as they may decide in the future.
- Section 2.1.6(C), add “API” to those Resp Org format and interface specifications for which Company is required to provide a minimum of 60 days notice for changes.
- Section 2.1.8(C), add language that updates the Help Desk procedure requiring an LOA and a copy of a bill for the subscriber and TFN to be moved from a disconnected Resp Org.
- Section 2.3.1(A)(2), add “load balancer” as a mechanism via which first-come, first-served can be accomplished within the TFN Registry.
- Section 2.3.1(A)(8), add “Pursuant to FCC rules,” eliminating confusion as to the origin of the prohibition against selling, bartering or brokering TFNs.
- Section 2.3.6, add security requirement to change passwords every 90 days and to notify Company within 24 hours if customer suspects security has been compromised.
- Section 2.4.1(B), modify the deposit requirements allowing Company to apply deposits to any balance past due by more than 60 days and/or require new deposits for Resp Orgs that have significant increases in their monthly bills over a two (2) month period.

- Section 2.4.1, remove “(E)” and “(F)”, the content for which had been removed in prior filings. Subsequent paragraphs are renumbered and references changed.
- Section 2.5.2, removed language specifying that TFN Registry relies on mainframe and mid-range computer systems as this is changing as the new platform is being introduced. Also add language stating that some interfaces require a dedicated connection.
- Section 2.5.2(A)(2), new language outlining multiple methods of non-dedicated access.
- Section 2.6.1, added section (E) which allows Company to use proprietary information to fight fraud and abuse, similar to 47 U.S.C. Sec. 222(d).
- Section 2.7, adding definitions for API and GUI. These additions required the movement of the TFN Registry definition (formerly Service Management System (SMS/800)) to be moved from page 52 to page 53.
- Section 3.3, new language outlining multiple methods of non-dedicated access.
- Section 3.3.1, new language outlining multiple methods of non-dedicated access.
- Add section 3.3.5, TFN Registry API Interface that describes a new machine to machine access mechanism.
- Add section 3.3.6, TFN Registry GUI Interface that describes a new interface.
- Section 3.4 previously on page 60 has been moved to a new page, 60.1.
- Section 3.6.1, removes language indicating ROC mandate will begin on June 30, 2017 and clarifies the requirement for ROC to be used for any Resp Org Change associated with a LOA.
- Section 3.6.2, modify language allowing for the Help Desk to perform Resp Org changes in situations where there is potential for subscriber loss of service. Removed language stating that Resp Orgs can submit Resp Org change requests via the website or by calling the Somos Help Desk, as all submissions must take place via the Centralized Resp Org Change system as of June 30, 2017.