

## DESCRIPTION AND JUSTIFICATION

### 1.0 Introduction and Description of Filing

In this tariff filing, scheduled to become effective June 24, 2019, Somos, Inc. (hereinafter referred to as “Company”) proposes changes to Tariff F.C.C. No. 1, 800 Service Management System (SMS/800) Toll-Free Number Registry (TFN Registry) Functions (SMS/800 Tariff) including: update to Technical Publications, notice new users of the TFN Registry must access the TFN Registry through the Graphical User Interface or Application Program Interface, notice that no new applications to become MGI users will be permitted after June 24, changes in the previously filed provisions to account for FCC changes in the hoarding and warehousing rules that allow for an auction and secondary market for certain TFNs, changes to the limitations on resources that are necessary for the new platform being deployed on June 24, and changes to the reporting available under the new platform. The proposed modifications are detailed below.

### 1.1 Modify Regulations and Service Offerings

- On pages 10 and 11
  - Update the titles, issue numbers and dates for certain Technical Publications. All publications are available as of the filing date for this tariff.
  - Add new technical publication: User Guide for the Toll-Free Number Registry Reporting.
  - Eliminate technical publication related to the Web Based Reporting System.
  - Note that new Resp Orgs must access the TFN Registry via the Graphical User Interface (GUI), and the Application Program Interface (API).
  - Note that no new applications to use the Mechanized Generic Interface (MGI) will be accepted. Those Resp Orgs who have started their MGI application process will be permitted to complete the process.
- Section 2.2.2, change the paragraph to read “The FCC has authorized a limited amount of toll free numbers in the 833 NPA to be assigned via competitive bidding. The FCC determined that prohibitions against warehousing, hoarding and the sale of toll free numbers described in sections (A) and (B) do not apply to these toll free numbers that are initially assigned by competitive bidding. The exception contained in this paragraph applies to the toll free number until that number is available for reassignment (spared) by a Responsible Organization. Once the number is spared, it will be subject to the warehousing, hoarding and sales prohibitions.” to account for the Commission’s new rules on Toll-Free Assignment. *See, Toll Free Assignment Modernization*, WC Docket No. 17-192, CC Docket No. 95-155, Report and Order, FCC 18-137 (rel. Sept. 27, 2018) (TFAM Order).
- Section 2.2.3 has been rewritten to account for the use limitations in the new platform. The new platform does not have a mainframe. Therefore, CPU usage is no longer relevant. The new limitation is on transactions per second, and reads as follows:
  - “ Resp Orgs will be limited to five thousand (5,000) transactions per minute. Any transactions beyond that amount will result in the Resp Org’s access being throttled, with the excess transactions permitted to be processed the following minute. This

capacity is shared across all of the Resp Org's IDs. For example, the Resp Org BR has three Resp Orgs IDs: BRABC, BRDEF and BRGHI. All transactions of BRABC, BRDEF and BRGHI will be attributed to BR.

If a Resp Org is found to repeatedly exceed the 5,000 transaction per minute threshold, that Resp Org will be notified via certified mail that it is in violation of this tariff and must reduce its transactions per minute in the TFN Registry immediately on receipt. Subsequently, the Resp Org must provide the Company with written agreement to permanently reduce its level of TFN Registry CPU capacity utilization to the level described above within fourteen (14) days of the date of receipt.

If the Resp Org does not reduce its utilization and provide the required written agreement, that Resp Org's access to the TFN Registry will be suspended for a period of seven (7) days and the Resp Org will be notified via certified mail of the suspension, or until the Resp Org provides the written agreement to permanently reduce its level of TFN Registry CPU capacity utilization to the level described above, whichever is later.

After a first suspension, if the Resp Org does not reduce its utilization in compliance with the tariff, that Resp Org's access to the TFN Registry will be suspended for a period of fourteen (14) days and the Resp Org will be notified via certified mail of the suspension.

After a second suspension, and for all subsequent suspensions, if the Resp Org does not reduce its utilization in compliance with the tariff, that Resp Org's access to the TFN Registry will be suspended for a period of twenty-eight (28) days and the Resp Org will be notified via certified mail of the suspension.

For access to the TFN Registry to be restored under this section, a fee equivalent to fifty percent (50%) of the charge for Service Establishment – First Logon ID (Section 4.2 [A]) will be assessed.”

- Section 3.1.3, eliminate references to reports that are no longer available. These reports have not been requested for a period of at least five years.
- Section 3.3.3, note that no new applications to use the Mechanized Generic Interface (MGI) will be accepted.
- Section 3.5, note that no new applications to use the Mechanized Generic Interface (MGI) will be accepted
- Section 4.1.2, eliminate references to reports that are no longer available.