



August 9, 2022

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

Re: CC Docket No. 95-155 Toll Free Service Access Codes;

CC Docket No. 96-115 Telecommunications Carrier's Use Of Customer Proprietary Network
Information And Other Customer Information

CC Docket No. 17-192 Toll Free Assignment Modernization

Dear Ms. Dortch:

In support of the letter filed by 800 Response Information Service's (800RIS) on August 3rd, 2022 I submit the following.

If telecommunications service providers (TSPs) are denied coarse location data it will greatly reduce the reliability of our telecommunications network and limit the use of many toll-free numbers dramatically.

Regionalized and shared use phone numbers are a testament to free market ingenuity. For example, a number like 1-800-LAWYERS can be used by several law firms, instead of just one, by routing callers to the law firm nearest them. The ability to route by location creates opportunities for businesses and is convenient for consumers. Businesses also use coarse location data to save time and money by limiting where they get calls come from. A business that only provides a service in a specific market can block calls from areas they don't service.

If calls are not routed properly people will turn to the internet instead where their location data is much more likely to be abused. The reason for this is because TSPs make their money by connecting phone calls properly. They have no need to sell, retain or abuse location data. On the other hand, location-based service providers' (LBSPs') entire business model is based upon selling location data. In addition to LBSPs, technology companies that give their products and services away for "free" sell location data to profit and serve advertisements. TSPs can make a profit without selling location data whereas, LBSPs and tech companies can't.

Profit motives aside, real-life implications exist if calls cannot be routed by location data. An example of this was in the Wall Street Journal on July 11, 2022, in an article titled "[One in Six Calls to National Suicide Prevention Lifeline End Without Reaching a Counselor](#)." The article states: "Calls are first routed to local crisis centers **based on area code** and forwarded to national backup centers if no one is available. **Answering locally is preferable**, officials said." Due to number portability, callers have phones with area codes that are not representative of where they are located when a call is placed. People that move, but keep their old phone number, end up being transferred to the crisis center associated with their cell phone area code, not to the one where they are located. This failure to route callers to the proper location is not just an inconvenience, but may be costing people their lives.



Four years has passed since 800RIS submitted its 2018 Petition for Emergency Declarative Relief. Please take this matter up and resolve it now so that TSPs can use coarse location data to route calls.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruno Tabbi, Jr.", is written over the typed name.

Bruno Tabbi, Jr.