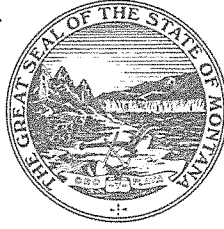


Montana Public Service Commission



Travis Kavulla - Vice Chairman
District 1

June 7, 2018

Kris Monteith
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Submission of Final Report, *Recommended Rule and Policy Changes: Toll Free Number Assignment Modernization*, by the North American Numbering Council

Dear Ms. Monteith:

On behalf of the North American Numbering Council (NANC), I have the pleasure of submitting to you the above-titled report, which you directed in your December 7, 2017 and Feb. 22, 2018, letters.

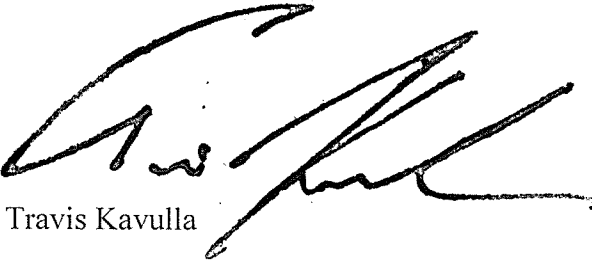
The Toll Free Assignment Modernization working group (TFAM) was tasked with evaluating a wide range of issues related to the questions raised in the Commission's 2017 Notice of Proposed Rulemaking on potential revisions to the toll-free assignment rules. The report individually addresses three categories of issues, with the TFAM having accomplished its work in this regard by dividing its work into smaller groups which in turn reported their consensus recommendations to the full working group and, ultimately, the NANC.

First, the report contains recommended changes to specific administrative rules that will facilitate the efficient transition to a market-based approach for the initial assignment of numbers that are presumed to be "high value," such as the 17,000 toll free numbers that have been set-aside in the recently opened 833 NPA. Together with these changes, the report raises potential complications of a movement to a market-based assignment mechanism. Second, with respect to prohibitions on the hoarding and brokering of toll-free numbers, the report recommends limited revisions to the Commission's brokering rule. These changes would allow for the transfer of a toll-free number or numbers in three specific instances, in lieu of the development of a full-scale,

lawful secondary market. Finally, the report concludes there is no need for a regulatory set-aside of toll-free numbers for government or non-profit use.

I thank the TFAM for its work on this matter. Should you have any questions, please do not hesitate to write or telephone me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Kavulla', written over a light blue horizontal line. The signature is fluid and cursive, with a long horizontal stroke at the end.

Travis Kavulla

Chairman, North American Numbering Council