

**DISSENTING STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

Re: *8YY Access Charge Reform*, WC Docket No. 18-156.

We've all been there—on hold with a bank, an airline, or an insurance company. Sometimes there is canned music to pass the time and calm the nerves. Other times, it's an unending cycle of pressing "0" to try to speak to a live person only to get passed around from one customer service agent to another. The saving grace of this mess has long been the fact that these calls don't cost anything. That's because for decades dialing 1-800 numbers has been free for consumers. But today the FCC proposes changes that could put an end to free 1-800 numbers. So the next time you make one of these calls, congratulations, you could pay for the privilege.

This is not right.

Toll-free dialing has long been a creature of an arcane system of intercarrier compensation overseen by this agency. The defining feature of this system is that consumers can make calls from any phone at no charge. Behind the scenes, however, a complex web of payments make these free calls possible. Over time, this system has been the subject of gaming and abuse. Enterprising folks who want to exploit these payment flows have set up calling practices that create arbitrage revenue and then split the profits. This is wasteful. It deserves to be fixed. But simply put, there needs to be a way to do so that doesn't saddle consumers with the bill.

Rather than being clear about what is being proposed, this rulemaking is littered with industry jargon. It offers a discussion of the most obscure call flows and payment schemes and then coyly offers that moving to a model where the end user pays for calling 1-800 numbers will "ultimately benefit consumers." I don't think so. While consumers on unlimited mobile plans may not immediately feel the pinch of this proposal, the rest of us who lack them certainly will. I dissent.