

3 March 2011

Honourable Betty Ann Kane  
Chairman, North American Numbering Council  
District of Columbia Public Service Commission  
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## **Re: Market-Based Allocation of Toll Free Numbers**

Honourable Betty Ann Kane

I am writing to you in my capacity as:

- 1) Chairman and Founder of Phone Name Marketing Australia Pty Ltd (Phone Names) – one of Australia's leading providers of toll free and free call numbers (1800 & 13/1300 numbers) and as;
- 2) President and Founder of the Australian Phone Word Association Ltd (APWA) - the Industry Body that represents the majority of companies involved in Australia's 'secondary market' for toll free and free call numbers.

I am interested in the introduction of a market-based allocation system for free call / toll free numbers in the United States of America as I was actively involved in the introduction of a market-based allocation system in Australia.

My interest in toll free numbering began when I was working in advertising in the USA in 1996 & 1997 and witnessed the increased effectiveness of toll free 'vanity' numbers compared to traditional 'geographic' numbers and 'numeric' toll free numbers.

I believe a market-based allocation system is in the best interests of all stakeholders as it enables the entity that places the most value on a specific number to acquire that number.

In Australia, the market-based allocation system involves an online auction process run by the Australian Communications and Media Authority (ACMA).

More information on this online auction process can be found at the website below.

<http://www.smartnumbers.com.au/>

Not only does the online auction system offer a fair and transparent process for entities wishing to acquire a toll free number, it also provides significant revenues for the Australian Government.

Soon after the introduction of the market-based allocation system in Australia, a 'secondary market' developed. Participants in the secondary market have – through investment in advertising and promotion - helped to stimulate demand for toll free numbers in the wider business community. The secondary market participants' main activities involve the selling, licensing, and sub-licensing of toll free numbers to Australian businesses.

After its formation in 2004, the secondary market Industry Body (APWA) worked with the ACMA to put in place a formal Complaints Process and Code of Conduct for its members.

Evidence of the successful adoption of the market-based allocation system – and the secondary market it enabled – is provided by the fact that since the introduction of the Code of Conduct and Complaints Process, the APWA has averaged less than one complaint a year.

Details of the Industry Body Complaints Process and Code of Conduct can be found at the links below.

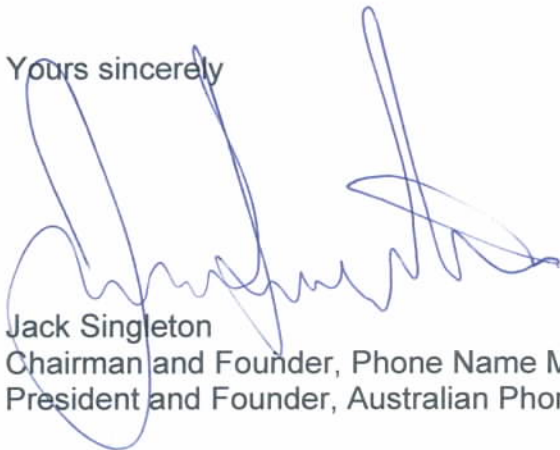
<http://www.ausphone.com.au/codeofconduct.html>

<http://www.ausphone.com.au/complaints.html>

It is my firm belief that the implementation of a market-based allocation system for toll free numbers in the USA would be as successful as it has been in Australia.

If you would like more information regarding the Australian market-based allocation system for toll free numbers, or any other information on the secondary market, please do not hesitate to contact me directly.

Yours sincerely



Jack Singleton  
Chairman and Founder, Phone Name Marketing Australia Pty Ltd  
President and Founder, Australian Phone Word Association Ltd