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| All commenters should use this form when submitting comments on an ATIS Letter Ballot ([view the instructions](http://www.atis.org/01_resources/docs/LB/ATIS_LB_CCRPreso.pdf)). ­This form should accompany the [letter ballot (via ATIS Workspace)](http://www.atis.org/01_aws/faqs.asp#Ballot) and will subsequently be used during comment consideration by the appropriate committee/subcommittee. The commenter should use the “track changes” feature when recommending changes to existing text. Proposed changes to a table, figure, or any other item that is not purely text, should include a summary in the table below and provide the modified table, figure, etc., in the “Other Information” section. The source file for any new figures (Visio, PowerPoint, etc.) must also be included (by either zipping together with this document, or embedding as a file/object). |

## [Note: Editor’s proposed resolutions to combined comments.]

## Letter Ballot: [PTSC-LB-246]

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| **Company Name: [Neustar]** |
| **TO BE COMPLETED BY COMMENTER** | **TO BE COMPLETED BY SUB/COMMITTEE** |
| **Auto#** | **Page/Section/Line #** | **Comment** | **Rationale/Suggested Solution** | **Type[[1]](#footnote-1)** | **Res.**[[2]](#footnote-2) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
|  | 3, 129, 144, 382, etc. | References should be made consistently (e.g., Line 3, “1000074 here and 1000074-E elsewhere) | Use consistent format |  |  | Accepted:updated |
|  | 13 | STI-AS | Spell out first use of acronyms? |  |  | Accepted: updated |
|  | 23, 24 | References to this report as “Standard”? | Remove if so |  |  | Accepted: updated |
|  | 96, 101 | References to 4474bis | Update to RFC |  |  | Accepted: updated to RFC 8224 |
|  | 141 | Better word choice for “codes” | Perhaps “conveys”? |  |  | Accepted/modified: How about “encodes” |
|  | 176 | Mixed use of “identity header” | Ensure use of “Identity header” |  |  | Accepted: updated |
|  | 282 | “for all calls”, really VoIP? | Change to “for all VoIP calls” |  |  | Accepted/modified: Changed to calls transiting the VoIP-based service provider network |
|  | 364 | Extra “s” | Remove |  |  | Accepted: updated |
|  | 396 | “analysis functions” could be confusing | Suggest changing to “analytics” or perhaps “CVT functions” |  |  | Accepted: Changed to analytics |
|  | 422-425 | Don’t believe we should go this far on a possible “origid” solution here, especially given the potential impact on industry traceback with SHAKEN. | Would delete sentence after “privacy issues”. |  |  | For discussion: This is not a concern for traceback which is done by SPC at the TSP and by call data and UNI info known directly by the OSP. Analytics will need to recognize origid may not be a permanent reference to source, but that may be true for other reasons as well. Text states only that “industry should consider” if there are privacy issues and suggests a possible solution.Clarified in text above that origid should be persistent and/or permanent and clarified its use in traceback and analytics |
|  | 445 | Missing word? | Change to “useful for traceback” |  |  | Accepted: updated |
|  | 446, 463 and others | Inconsistent use of SPs. In this context, should be “SP’s”? | Make consistent throughout document. |  |  | Accepted: Updated for possessive in 6.1, 6.2.2, 7, and A.1.3. Other instances of SPs indicate plural service providers. |
|  | 456-459 | Related to earlier comment on suggested “origid” solution. Would want to change this bullet. | Suggestion: “….business service, an originating SP could potentially consider use of a persistent, but not permanent, origid value, if the industry recognizes an associated privacy issue.” |  |  | Accepted/modified: Clarified that the value should be persistent and/or permanently assigned and that SP “should consider” use of a value not permanently assigned where that may cause a privacy exposure.Attestation and origid marking are issues for the populating OSP, so it is up to the OSP to recognize there is a privacy issue for a particular call source, as opposed to the industry. |
|  | A.1.5 | 3rd sentence: “for use of” or “for use by”?; two instances | Change accordingly – “for use by a particular VASP customer or platform …” |  |  | Accepted: Updated wording |
|  | A.4 | Have this title and text on same page as table | Move text |  |  | Accepted/modified: Table is landscape so it does not fit the same page format as the text. Replaced colon in the text with a period and changed “below” to a reference to Table A-1 to indicate it is found elsewhere. |
|  | Table A-1 | 3rd Row with data – “end use” or “end user” | Change accordingly |  |  | Accepted/modified: Changed to “end user’s use of TNs” |
|  | Page 21 | Page number shows “0” | Update accordingly to Page “21”? |  |  | Accepted: updated |

**Other Information (e.g., Tables, Figures):**

## Letter Ballot: PTSC & PTSC-LB-246

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| **Company Name: SOMOS** |
| **TO BE COMPLETED BY COMMENTER** | **TO BE COMPLETED BY SUB/COMMITTEE** |
| **Auto#** | **Page/Section/Line #** | **Comment** | **Rationale/Suggested Solution** | **Type[[3]](#footnote-3)** | **Res.**[[4]](#footnote-4) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
| 1. 1
 | Page 17/Section A.1.3/Line 2 | An SP may directly assign or port TNs to an enterprise as they would for an individual account, and the TNs are used with the SPs service. Also, an enterprise may acquire Toll-Free Numbers from a Resp Org, and the originating SP and the Resp Org are two separate entities. Enterprise customers may utilize multiple SPs to originate calls, and they may mark calls with a TN (such as a main business number, which includes Toll-Free Numbers) across all their providers regardless of which SP or Resp Org assigned the TN. | Include the use of Toll-Free numbers as calling numbers by Enterprise Customers as part of the use cases in Annex A. This will clarify that the content of the document is also applicable to Toll-Free numbers. |  |  | Accepted/modified: For clarity, included reference to toll-free numbers and assignment from RespOrgs as a separate sentence. Also added a more detailed explanation of determining authorized TF TN assignment under authorization use cases. |
|  | Page 18/Section A.1.4/Line 2 | A communications reseller may interact with TN-based identities in various ways. The reseller may receive direct TN assignments from an SP or a Resp Org (in case of Toll-Free Numbers) or port assigned numbers to a particular SP, and then they may resell use of these TNs to individual or enterprise end-user entities in association with the communications services originated through the assigning SP. They may also provide service on a “bring-your-own-number” basis where the end user has received TN assignments from other SPs, which includes Toll-Free Number assignments from other Resp Orgs. | Include the use of Toll-Free numbers as calling numbers by Enterprise Customers as part of the use cases in Annex A. This will clarify that the content of the document is also applicable to Toll-Free numbers. |  |  | Accepted/modified: Reseller paragraph updated to describe toll-free TN assignment by a RespOrg |
|  | Page 18/Section A.1.5/Line 5 | Some entities provide communications services ancillary to other services, for example a doctor’s office patient management platform with voice contact features. As with communications resellers, a value- added provider may arrange for TN assignments from an SP for use of a particular VASP customer or for the platform generally irrespective of customer, or customers may bring their own TN assignments, including Toll-Free Number assignments from a Resp Org, and delegate their use to the VASP to originate calls on the end customer’s behalf. | Include the use of Toll-Free numbers as calling numbers by Enterprise Customers as part of the use cases in Annex A. This will clarify that the content of the document is also applicable to Toll-Free numbers. |  |  | Accepted/modified: Acknowledged assignments from a RespOrg, at a point earlier in the paragraph. |
|  | Page 5/Section 3.1/Line 66 | **Responsible Organization (Resp Org)**: Entity designated as the agent for the Toll-Free subscriber to obtain, manage and administer Toll-Free Numbers and provide routing reference information in the SMS/800 Toll-Free Number Registry. | Include the definition of Responsible Organization since is mentioned in the previous comments. |  |  | Accepted: Definition added |
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**Other Information (e.g., Tables, Figures):**

***Letter Ballot: [PTSC-LB-246]***

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| **Company Name: Sprint** |
| **TO BE COMPLETED BY COMMENTER** | **TO BE COMPLETED BY SUB/COMMITTEE** |
| **Auto#** | **Page/Section/Line #** | **Comment** | **Rationale/Suggested Solution** | **Type[[5]](#footnote-5)** | **Res.**[[6]](#footnote-6) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
| 11 | Lines 96, 101 | Editorial: On lines 96 and 101 there is a reference to 4474bis, but it isn’t in reference form (reference number in square brackets) and is not included in the normative references. |  |  |  | Accepted |
| 11 |  | Technical: 4474bis should be replaced with RFC 8224. |  |  |  | Accepted |

1. Type of change: Insert **S** or **NS**: Substantive (**S**) (*see [ATIS OP](http://www.atis.org/01_legal/operatingpro.asp) Section A.6*) or Non-Substantive (**NS**) [↑](#footnote-ref-1)
2. Resolution (how was comment considered): Insert **A**, **AM**, **N**, **I**, or **W**: Accepted (**A**), Accepted as Modified (**AM**), Not Accepted (**N**), For Information/No Action/Noted (**I**), or Withdrawn (**W**). [↑](#footnote-ref-2)
3. Type of change: Insert **S** or **NS**: Substantive (**S**) (*see* [*ATIS OP*](http://www.atis.org/01_legal/operatingpro.asp) *Section A.6*) or Non-Substantive (**NS**) [↑](#footnote-ref-3)
4. Resolution (how was comment considered): Insert **A**, **AM**, **N**, **I**, or **W**: Accepted (**A**), Accepted as Modified (**AM**), Not Accepted (**N**), For Information/No Action/Noted (**I**), or Withdrawn (**W**). [↑](#footnote-ref-4)
5. Type of change: Insert **S** or **NS**: Substantive (**S**) (*see [ATIS OP](http://www.atis.org/01_legal/operatingpro.asp) Section A.6*) or Non-Substantive (**NS**) [↑](#footnote-ref-5)
6. Resolution (how was comment considered): Insert **A**, **AM**, **N**, **I**, or **W**: Accepted (**A**), Accepted as Modified (**AM**), Not Accepted (**N**), For Information/No Action/Noted (**I**), or Withdrawn (**W**). [↑](#footnote-ref-6)