Beginning on May 15, 2022, all new Toll-Free numbers must be verified before sending traffic. Any existing Toll-Free numbers running traffic on your account must be verified by September 30, 2022.

It now looks like it doesn't matter if you use Toll Free or 10 digit its all going to need to be registered in some type of fashion.

Toll Free-

You must submit the following to Twilio support for verification.

Business Name
Company Website
Business Address
Compliance Contact
Expected Message Volume
Phone numbers to be verified
Use Cases
Description of the use Case/Summary
Production Message Content
Opt-in Description
Opt-in details (link to, image of, scanned copy of opt-in)