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November 25, 2019

Via Email

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Reassigned Number Database Guidelines
CG Docket 17-59

Dear Ms. Dortch,

The Alliance for Telecommunications Industry Solutions (ATIS) is writing to express input from its Industry Numbering Committee (INC) regarding the Reassigned Number Database (RND).

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS works on many important issues on behalf of the industry. ATIS INC addresses and resolves industry-wide issues associated with planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area.

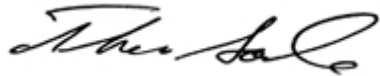
INC is aware of the North American Numbering Council's (NANC) Numbering Administration Oversight Working Group (NAOWG) effort to develop a Technical Requirements Document (TRD) for the RND. INC has reviewed the Commission's *Second Report and Order* establishing the RND (FCC 18-177) and recognizes the need for Guidelines related to the service providers' responsibilities to collect and provide disconnected number data into the RND. INC has insight into service provider operations and processes and stands ready to develop such Guidelines.

INC has significant expertise in developing guidelines and recommendations that are used by the North American Numbering Plan Administration (NANPA) and the national Pooling Administrator (PA) in the management of numbering resources and utilized by service providers.

INC respectfully assumes the responsibility to develop service provider guidelines for the RND, and will keep the Commission and the NANC updated on its work. Unless the FCC has any concerns, INC will begin working on these guidelines when the TRD is made public.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Thomas Goode
ATIS General Counsel

cc: Marilyn Jones, NANC DFO, Wireline Competition Bureau, marilyn.jones@fcc.gov
William Andrlle, Attorney, Wireline Competition Bureau, william.andrle@fcc.gov
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