

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
Telephone Number Requirements for IP-Enabled Service Providers	)	WC Docket No. 07-243
	)	
Implementation of TRACED Act Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources	)	WC Docket No. 20-67
	)	
Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership	)	IB Docket No. 16-155
	)	

**Comments of the  
Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced docket. In the *FNPRM*, the Federal Communications Commission (Commission) proposes to update its rules regarding direct access to numbers by interconnected VoIP providers to reduce illegal robocalling. ATIS supports the Commission’s efforts to combat illegal robocalling but opposes requiring direct access to number applicants to certify that the VoIP numbers for which they are applying will only be used to provide interconnected VoIP services. ATIS supports the required return of telephone numbers by providers whose authorizations have been revoked only if the revocations were due to national security risks or risk of originating numerous unlawful robocalls. Finally, ATIS asks the Commission to revise its rules to eliminate the requirement that interconnected VoIP providers send 30-day notices to state commissions for growth requests.

## I. BACKGROUND

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' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' Industry Numbering Committee (INC) is the industry's open forum for addressing and developing solutions for numbering issues. 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 guidelines and recommendations are used by service providers, the [North American Numbering Plan Administration \(NANPA\)](#) and the [Canadian Radio Television and Telecommunications Commission \(CRTC\)](#) in the management of numbering resources.

## II. COMMENTS

In the *FNPRM*, the Commission seeks input on what changes it should make to its direct access authorization rules to help eliminate access stimulation and other forms of intercarrier

compensation arbitrage.<sup>1</sup> The Commission asks whether it should require direct access to number applicants to certify that the VoIP numbers they are applying for will only be used to provide interconnected VoIP services as opposed to, for example, application-based services.<sup>2</sup> This proposed restriction on the use of VoIP numbers would unfairly restrict providers of VoIP service, as other types of providers do not have to provide this type of certification. While ATIS INC believes that any entity with direct access to numbers must fulfill all Code Holder responsibilities (e.g., default routing), follow all INC guidelines, and comply with applicable Commission regulations, ATIS INC also believes that all providers, including interconnected VoIP providers, should be afforded the same flexibility regarding the use of telephone numbers.

The Commission in the *FNPRM* clarifies that it may also revoke a service provider authorization: for failure to comply with any applicable law; where a provider no longer meets the qualifications that originally provided the basis for the grant of direct access to numbers; or where the authorization no longer serves the public interest (e.g., due to a national security risk or risk of originating numerous unlawful robocalls).<sup>3</sup> The Commission asks whether it should also require the provider whose authorization has been revoked to return numbers that it has already obtained directly, or whether such a requirement would be too disruptive to end users.<sup>4</sup> ATIS INC believes that the Commission generally should not require the return of already obtained numbers because of the potential significant negative impacts that such a requirement could have on customers. ATIS INC believes the Commission should consider requiring the return of numbers only if the revocation was due to a national security risk or risk of originating numerous unlawful robocalls. If the Commission were to require returns in these limited

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<sup>1</sup> *FNPRM* at ¶ 17.

<sup>2</sup> *Id.*

<sup>3</sup> *FNPRM* at ¶37.

<sup>4</sup> *Id.*

circumstances, it would need to consider how to minimize the impact to customers who are using the numbers to provide legitimate services (for example, those customers not originating illegal robocalls). The Commission also would need to consider how it would identify new providers to support the numbers previously supported by providers whose authorizations were revoked and what would happen if a provider's authorization was to be reinstated (would the new provider retain the customer or would the customer be "returned" to the newly-reinstated provider).

The Commission also notes that its existing rules generally require interconnected VoIP providers obtaining numbers to, among other things, file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrator.<sup>5</sup> Under these rules, notices and associated proof that the notices were sent to the respective state commission are required for both initial and growth numbering resources. ATIS INC does not believe that such notices should be required for growth resources but should be required only for initial requests. Requiring a 30-day notice for growth requests is burdensome and puts interconnected VoIP providers at a considerable disadvantage compared to other industry sectors because it extends the procurement process by 30 days for any sort of resource (code or block, initial or growth). Moreover, notices regarding growth numbering resources are not necessary to track number exhaust; once the state is notified that an interconnected VoIP provider is procuring numbering resources in a given state, the state can leverage forecasting and block application reports provided by the NANPA to track number exhaust (like other industry sectors). ATIS also notes that some interconnected VoIP providers already actively take steps to mitigate number exhaustion independent of state notification requirements, including seeking out code transfers when procuring location routing numbers (LRNs), waiting until the pool is

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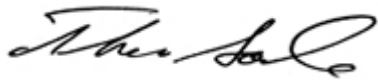
<sup>5</sup> *FNPRM* at ¶ 7.

replenished before requesting resources in smaller rate centers, and analyzing local calling exchanges to preserve blocks. ATIS INC therefore requests that the Commission revise its rules to eliminate the requirement that interconnected VoIP providers send 30-day notices to state commissions for growth requests.<sup>6</sup>

### III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *FNPRM* and urges the Commission to consider the recommendations above.

Respectfully submitted,



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<sup>6</sup> See also Comments of the Alliance for Telecommunications Industry Solutions (ATIS) to Technological Advisory Council's inquiry into reforming technical regulations, submitted October 30, 2017, ET Docket No. 17-215, at p. 7.