



Federal Communications Commission
Washington, D.C. 20554

February 20, 2024

The Honorable Karen Charles
Commissioner, Massachusetts Department of Telecommunications and Cable
Chairwoman, North American Numbering Council
1000 Washington Street, Suite 600
Boston, MA 02110

Re: Numbering Administration Oversight Working Group

Dear Chairwoman Charles:

In September 2023, the Commission released a Second Report and Order and Second Further Notice of Proposed Rulemaking to strengthen the Commission's rules governing the process for direct access to numbers by interconnected voice over Internet Protocol (VoIP) providers in order to help stem the tide of illegal robocalls, protect national security and law enforcement, safeguard the nation's finite numbering resources, reduce the opportunity for regulatory arbitrage, and further promote public safety.¹ The Wireline Competition Bureau (Bureau) acknowledges and thanks the North American Numbering Council (NANC) and the Numbering Administration Oversight Working Group (NAOWG) for their continued valuable work on these critical issues.

Consistent with the *Second Report and Order*,² the Bureau once again calls on the NANC to assist with these priorities. Specifically, we direct the NANC to issue a report, no later than **December 17, 2024**, on number use and resale, as well as number reclamation. We direct the NANC to address the following topics in its report:

- how interconnected VoIP providers that obtain direct access to numbers are using those numbering resources today, including, for example, the extent to which they use numbers obtained in a state to serve customers located in that state, the extent to which they use numbers obtained via direct access to provide non-interconnected VoIP service, and the extent to which numbers obtained via direct access are resold to other providers;
- how use of numbers by interconnected VoIP providers (including use by direct and indirect customers of such providers) complies with the Commission's robocalling and access stimulation rules;
- how use of numbers by interconnected VoIP providers (including direct and indirect customers of such providers) affects area code exhaust and other public interest concerns;
- the potential consumer benefits or competitive harms of increasing the availability of direct access to numbers or placing additional limits on the use of numbers obtained via direct access;

¹ *Numbering Policies for Modern Communications et al.*, WC Docket No. 13-97 et al., Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 23-75 (rel. Sept. 22, 2023) (*Second Report and Order*).

² *Id.* at paras. 68-73. In a separate referral letter, the Commission is directing the NANC Call Authentication Trust Anchor (CATA) Working Group to examine certain other issues associated with number use by interconnected VoIP providers.

- possible options for mitigating any identified adverse impacts on consumers of number disuse, misuse, and resale, and how any Commission-imposed requirements for, or limits on, number use or resale would impact consumers, providers, and competition;
- ways to minimize the adverse impacts on consumers and/or area code exhaustion arising from interconnected VoIP providers obtaining numbers in a state where they serve few or no customers, including the efficacy of Commission adoption of a “minimum contacts” requirement to obtain numbering resources in a particular state, and possible options for defining such a standard;
- the potential impact on consumers, end-users, and providers of reclaiming numbers already assigned to holders of direct access authorizations that have their authorizations revoked;
- how providers or the Commission could mitigate any identifiable negative impacts of number reclamation resulting from the revocation of direct access authorizations for consumers and end-users;
- how interconnected VoIP providers use numbering databases in providing service, and how a restriction on accessing such databases accompanying number reclamation would impact consumers, end-users, and providers; and
- how to return reclaimed numbers to providers with reinstated direct access authorizations.

If you have questions about this referral, please contact Christi Shewman, the NANC’s Designated Federal Officer, at christi.shewman@fcc.gov. We appreciate the NANC’s commitment to ensuring the security and integrity of the telephone network, and its work to protect American consumers from fraud and deception.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trent Harkrader".

Trent Harkrader
Chief
Wireline Competition Bureau