

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

In the Matter of)	
)	
Protecting Consumers from Unauthorized)	CG Docket No. 17-169
Carrier Changes and Related Unauthorized)	
Charges)	
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170

**COMMENTS OF
THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s (Commission) July 25, 2025, *Notice of Proposed Rulemaking (NPRM)* in the above-referenced docket. In the *NPRM*, the Commission seeks comment on proposed changes to its slamming and billing rules to modernize and simplify the rules to reflect the evolution of the telecommunications marketplace and reduce regulatory burdens.¹ ATIS supports the Commission’s efforts to alleviate unnecessary burdens and urges the Commission to evaluate the continued need for Primary Interexchange Carrier (PIC) verification to determine if the 700 Central Office (CO) Code can be used as an Numbering Plan Area (NPA) and if the 700 Codes within geographic NPAs can be assigned as General Purpose Codes.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops

¹ *NPRM* at ¶2.

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.

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 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 *NPRM*, the Commission seeks comments on whether its slamming and/or its billing rules remain necessary and, if so, how these rules should be modernized and streamlined.² The Commission specifically proposes to eliminate the rules related to Third Party Verification, Letters of Agency, an electronic authorization (a call to a toll-free number that records the caller's originating automatic number identification), and state-enacted verification procedures

² *NPRM* at ¶¶12-14.

applicable to intrastate service³. While ATIS INC expresses no opinion on the continued utility of the Commission slamming or billing rules, it urges the Commission to consider streamlining its rules by eliminating the use of the 700 NXX Code for PIC Verification.

As explained in Section 258 of the Communications Act, telecommunications carriers may only submit or execute a change in a subscriber's selection of a provider of telephone exchange service or telephone toll service in accordance with Commission-prescribed verification procedures.⁴ The 700 CO Code and the 700 NPA Code are utilized for PIC verification, with specific dialing formats for Intra-LATA (Area Code-700-4141) and Inter-LATA (700-555-4141). As explained in ATIS INC's Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines, the 700 CO code is not assignable by the North American Numbering Plan Administrator as a CO Code because of its use in PIC verification.⁵ Moreover, while existing 700 NXX code assignments in the U.S. are grandfathered for their originally assigned purposes, any 700 CO Codes within geographic NPAs returned to the NANPA must be made unavailable for assignment to support the continued use of NPA-700-4141 for Intra-LATA PIC verification.⁶ ATIS urges the Commission to evaluate the continued need for PIC verification to determine if the 700 CO Code can be used as an NPA and if the 700 Codes within geographic NPAs can be assigned as General Purpose Codes. Making this code more available will benefit telecommunications service providers and their consumers.

³ *NPRM* at ¶16.

⁴ 47 USC §258.

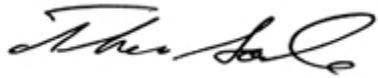
⁵ ATIS Standard on Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (ATIS-0300119), Section 7.37 (published April 2, 2025). This standard is available at no charge from <https://access.atis.org/higherlogic/ws/public/documents?view>.

⁶ *Id.* In the U.S.'s 13 geographic NPAs, the 700 Code was assigned to specific service providers before its special use designation in 1996. In Canada, the 700 Code has been assigned as a General Purpose Code in 45 instances.

III. CONCLUSION

ATIS supports the Commission's efforts to reduce barriers to innovation and enhance consumer protection and recommends that the Commission evaluate the continued need for PIC verification to determine if the 700 CO Code can be used as an NPA and if the 700 Codes within geographic NPAs can be assigned as General Purpose Codes.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

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