

**DEPARTMENT OF PUBLIC SERVICE REGULATION  
BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MONTANA**

In re Commission Investigation	)	
of Feasibility, Benefits, and	)	
Costs of Telephone Number	)	Docket 2025.08.062
Conservation through Rate	)	
Center Consolidation	)	

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

The Alliance for Telecommunications Industry Solutions (ATIS) submits these comments in response to the *Notice of Investigative Docket and Opportunity to Comment (Notice)* in the above-captioned docket. In the *Notice*, the Montana Department of Public Service Commission (PSC) seeks comments on the feasibility, costs, and benefits of implementing rate center consolidation in Montana.<sup>1</sup> As the developer of the numbering guidelines used by the telecommunications industry, ATIS is pleased to have the opportunity to provide input to the *Notice*. ATIS urges the Montana PSC to consider the important guidance provided by the ATIS *Large-Scale Rate Center Consolidation (LSRCC) Reference Document*, developed by ATIS' Industry Numbering Committee (INC). This document recommends, among other things, that:

- Preparatory steps be taken prior to LSRCC to ensure alignment, minimize disruption, and preserve competitive neutrality;
- States coordinate efforts to avoid pursuing initiatives independently or simultaneously without national coordination;
- Consolidation of rate centers that result in a rate center spanning across more than one Local Access and Transport Area (LATA) must be avoided;

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<sup>1</sup> *Notice*, Docket 2025.08.062 (September 5, 2025) at ¶8.

- Early notification to the North American Numbering Plan Administrator (NANPA) and iconectiv TruOps Telecom Routing Administration (TRA) is essential; and
- Consolidations be scheduled to minimize operational risk.

## **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 boasts a diverse and influential membership base, comprising leading stakeholders from the Information and Communications Technologies (ICT) sector – including wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety agencies; and internet service providers. This broad representation ensures that ATIS's standards are robust, relevant, and widely adopted, facilitating seamless integration across various platforms and services. Moreover, ATIS is a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), a globally recognized collaborative initiative responsible for the development of critical wireless standards such as 4G LTE and 5G New Radio (NR). Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees, including ATIS INC.

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 NANPA and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.

## II. Comments to the *Notice*

In the *Notice*, the Montana PSC asks for feedback on issues related to possible rate center consolidation in Montana. ATIS INC is pleased to have the opportunity to provide its input to the notice and urges the Montana PSC to consider the guidance found in ATIS INC's Large-Scale Rate Center Consolidation (LSRCC) Reference Document.<sup>2</sup> In that document, ATIS INC explains that state regulatory bodies should take deliberate preparatory steps to ensure alignment, minimize disruption, and preserve competitive neutrality before initiating an LSRCC, such as hosting an informational webinar or industry call to brief stakeholders, including the NANPA and TRA, on timelines and expectations.<sup>3</sup> These efforts will support a smoother implementation for all stakeholders.

In addition, state regulatory bodies should coordinate and avoid pursuing initiatives independently or simultaneously without national coordination. Overlapping implementations in multiple states will strain shared industry resources, may introduce confusion for SPs operating in multiple jurisdictions, and increase the risk of routing and billing errors or implementation delays. National-level collaboration and communication will ensure that consolidation activities are staggered appropriately, with ample lead time and industry awareness.

Early notification to the NANPA and TRA are also essential to ensure that updates to the NANP Administration System (NAS) and iconectiv Business Integrated Routing and Rating Database System (BIRRDs) are aligned with the proposed consolidation effort. Early engagement of these entities allows sufficient lead time for industry system modifications,

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<sup>2</sup> *Large-Scale Rate Center Consolidation (LSRCC) Reference Document* (ATIS-0300121), Approved August 21, 2025. This document is available at no charge from <https://atis.org/committees-forums/inc/documents/>. Much of the guidance in this document applies to any rate center consolidation.

<sup>3</sup> *Large-Scale Rate Center Consolidation (LSRCC) Reference Document*, Section 7.

industry notices, and the synchronization of critical operational timelines, and facilitates industry-wide awareness facilitated to help maintain routing integrity and call completion.

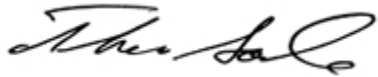
ATIS INC notes that it is essential to avoid consolidating rate centers that result in a rate center spanning across more than one LATA. LATAs serve as boundaries for call routing and interconnection, and changes that impact multiple LATAs can introduce significant operational complications. Consolidating across LATAs can lead to routing conflicts, require new or modified interconnection agreements, and complicate billing and rating systems. Moreover, such changes can have substantial implications for the NPAC, which relies on LATA boundaries to manage and route ported numbers effectively. Altering these relationships increases the risk of database inconsistencies and misrouted traffic. Moreover, legacy systems/switching equipment are technically unable to consolidate rate centers across LATA boundaries. For these reasons, consolidation should remain within a single LATA boundary.

It is also important to schedule consolidations during timeframes that minimize operational risk. Specifically, implementation of LSRCC should be avoided during the North American Numbering Plan Numbering Resource Utilization/Forecast (NRUF) Report (FCC Form 502) filing cycles. These periods require concentrated administrative focus and can increase the risk of conflicting updates. Similarly, major holidays and year-end periods often coincide with network changes and supporting entity moratoriums, which limit the ability to make routing or database changes. Planning LSRCC activity outside of these timeframes ensures the availability of technical and operational support from all parties involved.

### **III. Conclusion**

ATIS INC urges the Montana PSC to consider the guidance in the *Large-Scale Rate Center Consolidation (LSRCC) Reference Document* when considering rate consolidation in Montana. ATIS INC urges the PSC to avoid pursuing initiatives without national coordination, to avoid consolidating rate centers that result in a rate center spanning across more than one LATA, and to schedule consolidations to minimize operational risk.

Respectfully Submitted,

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

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