

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Updating and Consolidating Telephone	)	RM 12012
Numbering and Routing Systems for an Efficient	)	
IP Transition	)	

**RESPONSE TO PETITION FOR RULEMAKING**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s December 8, 2025, *Public Notice* seeking comment on the *Petition for Rulemaking* (Petition) filed by Somos, Inc. (Somos). In its *Petition*, Somos urges the Commission to issue a notice of proposed rulemaking to examine the current structure of telephone numbering and routing systems to facilitate an efficient transition to IP-based networks. ATIS is pleased to see that the *Petition* recognizes the important role that ATIS’ Industry Numbering Committee (INC) has played and continues to play in addressing numbering issues. As explained below, ATIS INC has demonstrated a long history of addressing and resolving important numbering-related issues, including those related to the transition to IP.

**I. Background**

ATIS is a global standards development and technical planning organization that develops and promotes technical and operational standards for the information and communications technologies sector. ATIS boasts a diverse and influential membership base, including stakeholders from wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety agencies; and internet service providers. 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). More than 600 subject matter experts participate in ATIS open industry forums and committees, including ATIS INC.

## **II. Response to *Petition***

In its *Petition*, Somos acknowledges INC's role in the industry, explaining that INC is "devoted to addressing and developing solutions for numbering issues" and "may adopt guidelines with respect to numbering administration."<sup>1</sup> ATIS agrees that INC plays an important role in the management of numbering resources.

ATIS INC is *the* industry's forum for addressing and developing solutions for numbering issues. INC addresses and resolves industry-wide issues associated with the planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) and 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. Participation in ATIS INC is open to all stakeholders, including wireless and wireline service providers, equipment manufacturers, database vendors, and others.<sup>2</sup>

INC publishes key numbering-related guidelines used by the industry, addressing a broad array of important issues. These deliverables were developed and are maintained by INC using ATIS' voluntary, open, consensus-based processes. These processes encourage full and fair

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<sup>1</sup> *Petition* at p. 7.

<sup>2</sup> ATIS INC includes subject matter experts from: 10x People, AT&T, Bandwidth, Boost Mobile, Brightspeed, Canadian Numbering Administrator (CNA), Charter, Comcast, COMsolve, Cox, iconectiv, JSI, Local Number Portability Administrator (LNPA), Lumen, Mediacom, North American Numbering Plan Administrator (NANPA), Numeracle, Sinch, Somos, T-Mobile, TDS, Telnyx, Transaction Network Services, TransUnion, Verizon, and Vonage.

discussions of the issues, leveraging INC participants' extensive technical and practical experience to ensure that industry guidance is effective and implementable, and promotes the fair and efficient use of finite numbering resources. INC also maintains and updates these documents as necessary to reflect evolving technologies and industry practices.

Among the important industry guidance that INC has developed and maintains are the  
INC:

- Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG) (ATIS-0300119), which provide direction on the administration and assignment of Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-Xs) to Local Number Portability (LNP)-capable Service Provider (SPs) within geographic numbering plan areas (NPAs).
- Guidelines for the Administration of Telephone Numbers (ATIS-0300070), which identify Service Provider (SP) responsibilities with respect to individual telephone numbers in the 10-digit NANP number format (NPA-NXX-XXXX) within existing geographic central office (NXX) codes administered by the NANPA. It contains guidelines for the administration of Aging Numbers, Reserved Numbers, and Sequential Number Assignment.
- North American Numbering Plan Numbering Resource Utilization/Forecast Reporting (NRUF) Guidelines (ATIS-0300068), which provide guidance and establish procedures to address the North American Numbering Plan Numbering Resource Utilization/Forecast (NRUF) Report.
- Location Routing Number Assignment Practices (ATIS-0300065), which establish industry criteria for the assignment and administration of Local Routing Numbers (LRN), a new numbering resource.
- NPA Code Relief Planning and Notification Guidelines (ATIS-0300061), which provide direction regarding the assignment of NPA codes.
- NPA Allocation Plan & Assignment Guidelines (ATIS-0300055), which provide guidance for the assignment of Numbering Plan Area (NPA) codes.
- Non-Geographic 5XX-NXX Code Assignment Guidelines (ATIS-0300052), which provide direction to the industry regarding the assignment of NXX codes within a 5YY non-geographic Service Access Code (SAC) used for personal communications services.
- P-ANI Administration Guidelines (ATIS-0300089), which provide guidance regarding the administration and assignment of non-dialable pseudo-Automatic Number Identification (p-ANI) numbers to Eligible Users in areas where access to such numbering resources has been ordered or implemented.
- 9YY NXX Code Assignment Guidelines (ATIS-0300060), which provide guidance to carriers for the assignment of NXX codes within the 9YY Service Access Code (SAC).

- Carrier Identification Code (CIC) Assignment Guidelines (ATIS-0300050), which describe guidelines for the assignment of Carrier Identification Codes (CICs) in the North American Numbering Plan (NANP) area. The requirements apply to all CICs (e.g., the access and usage requirements for retaining CICs) regardless of the manner through which an entity obtained a code.
- Procedures for Change in E.164 Country Code Assignments (ATIS-0300054), which establish a uniform U.S. procedure that coordinates the awareness and implementation functions for all Country Code assignment changes and ensures the participation of all appropriate carriers/networks.
- Vertical Service Code (VSC) Assignment Guidelines (ATIS-0300058), which provide-guidance on the assignment of Vertical Service Codes (VSC) for which standardization or consistency is desired across all industry sectors in the Public Switched Telephone Network (PSTN).

INC believes that, while the Commission's IP Interconnection docket is pending, the industry's numbering systems and functional processes should be maintained and may be revamped incrementally as necessary to create efficiencies and minimize operational burden for the industry. The IP transition and numbering system updates should not be undertaken simultaneously and should be done in a way that minimizes industry-wide changes, so that service providers can focus on the IP transition. Although some enhanced modifications to these systems may be necessary to facilitate IP interconnection, redesigning these systems is unnecessary and would only serve to distract and delay the Commission's efforts to accelerate the transition of communications networks to all-IP technology.<sup>3</sup>

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<sup>3</sup> The views expressed in this paragraph are not supported by Somos, Inc., an ATIS INC member.

### **III. Conclusion**

ATIS appreciates the opportunity to provide its input to the Somos *Petition* and urges the Commission to acknowledge the important role that ATIS INC has played and continues to play in addressing numbering issues.

Respectfully submitted,

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

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January 7, 2026

## CERTIFICATE OF SERVICE

I, Jo Seibel, do hereby certify that on this 7th day of January 2025, I have caused a copy of the foregoing comments of the Alliance for Telecommunications Industry Solutions (ATIS) in RM-12012 to be served by first class mail, postage paid, upon:

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