

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

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97
)	
Rules and Regulations Implementing the)	CG Docket No. 02-278
Telephone Consumer Protection Act of 1991)	
)	
Dismissal of Outdated or Otherwise Moot)	CG Docket No. 25-307
Robocalls Petitions)	

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

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Industry Numbering Committee (INC), hereby submits these reply comments in response to the comments submitted to the Federal Communications Commission’s (Commission) October 29, 2025, *Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59*; *Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97*; *Further Notice of Proposed Rulemaking in CG Docket No. 02-278*; *Public Notice in CG Docket No. 25-307 (Notice)*. In the *Notice*, the Commission seeks comments on whether it should establish numbering requirements to enable consumers to identify foreign-originated calls, such as the designation of a specific area code for foreign-originated calls.¹ ATIS INC opposes the use of finite NANP resources for this purpose and notes that there are a number of challenges and unresolved issues associated with this proposal, a position supported by a number of commenters.

¹ *Notice at ¶¶79-80.*

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.

ATIS 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. REPLY COMMENTS

In the *Notice*, the Commission seeks comment on whether it should establish numbering requirements to enable consumers to identify foreign-originated calls.² The Commission asks whether it should designate a specific area code for foreign-originated calls, as well as the

² *Notice* at ¶¶79-80.

challenges associated with such a designation.³ ATIS INC strongly opposes designating an area code for foreign-originated calls, a view supported by commenters such as CTIA, Twilio Inc. and Twilio US Technology Inc. (Twilio), Verizon, and Vistra Corp. (Vistra).⁴

As noted by Verizon and CTIA in their comments, NANP resources are finite and designating an area code for foreign-originated calls would impact NANP exhaust as setting these numbers aside for this purpose would preclude assignment of these numbers to customers in the NANP.⁵ Further, ATIS INC notes that these numbers will likely require more than one area code. Thus, the issue of NANP exhaustion is further exacerbated, alongside the additional concerns outlined below. ATIS INC also notes that there are laws and regulations that would require these numbers to be dialable in certain situations or for certain types of calls.⁶

NANP numbers that are used outside the U.S. are administered by the specific countries that are members of the NANP and have NPAs allocated accordingly. Because the proposed NPA would be located outside the U.S. and outside of any LATA or Rate Center, there may be routing issues associated with these calls. A geographic NPA without a specific State, LATA, or Rate Center creates routing and number administration issues where there is no specific jurisdictional location or network where calls destined for such NPA(s) may be routed. It is unclear how such a

³ Notice at ¶79.

⁴ CTIA Comments at p. 19 (the creation of new area codes for foreign-originated calls would confuse consumers, create unnecessary burdens for legitimate U.S. businesses and could contribute to concerns over numbering resource exhaustion); Twilio Comments at p. 12 (creating special area codes for foreign-originated calls is unnecessary and would create unnecessary burdens for legitimate US businesses); Verizon Comments at p. 8, n. 11 (designating an area code for foreign-originated traffic would unnecessarily consume valuable NANP numbers); and Vistra Comments at p. 4 (labeling foreign-originated calls with a specific area code could confuse consumers and could lead to important and lawful calls being blocked or ignored).

⁵ Verizon Comments at p. 8, n.11; CTIA Comments at p. 19.

⁶ For example, 16 CFR 310.4 explains that it is an abusive telemarketing act or practice and a violation to fail “to transmit or cause to be transmitted the telephone number, and, when made available by the telemarketer's carrier, the name of the telemarketer, to any caller identification service in use by a recipient of a telemarketing call.” See also 47 CFR 64.1200(d)(4), which requires persons or entities making artificial or prerecorded-voice telephone calls or any call for telemarketing purposes to provide, among other things, a telephone number or address at which the person or entity may be contacted.

geographic NPA or NXX/Central Office Code would be allocated, how calls that potentially originate from any of the 50 U.S. States would route to such NPAs, or the providers that assign telephone numbers from such NPAs. Multiple providers may serve multiple customers located across the U.S. Thus, these numbers would require a routing system similar to the toll free system, potentially pulling multiple NPAs from the numbering resources designated to expand the use of non-geographic numbers. The available non-geographic number resources are already limited in availability and reserved for future expansion for toll free. There are likely other solutions to identify foreign-originated calls using NANP numbers in the caller ID field without using finite NANP resources.

ATIS INC also believes that, considering existing NXXs/7-digit dialing plans assigned within the NANP, and potential conflicts, it would be challenging to identify an area code for this purpose that would not impose unnecessary burdens and/or challenges on the industry and consumers alike. ATIS also agrees with Verizon that moving existing foreign users of U.S. NANP numbers to a new area code would impose significant technical, operational, and administrative burdens to the entire industry, entailing complex rerouting, updates to countless databases, and extensive consumer outreach.⁷

The Commission should avoid the challenges associated with the designation of 988 for the Suicide & Crisis Lifeline, which required costly switch upgrades/replacements for legacy/TDM wireline service providers and imposed consumer-affecting 10-digit local dialing changes associated with the use of 988 in more than 80 area codes that still used 7-digit dialing and had designated 988 as an NXX. The Commission should not impose additional requirements

⁷ Verizon Comments at p. 8, n.11.

on legacy/TDM networks but instead should continue its efforts to promote the transition to all IP.

ATIS INC appreciates that the Commission acknowledges that there are other implementation issues that would need to be addressed associated with the proposed new area code, such as how numbering resources in such area codes should be assigned.⁸ Other issues that must be resolved before an area code could be used as proposed include: (1) would these resources be assigned by the NANPA and managed by SPs, or would there be some other management structure; (2) how would numbers currently assigned to foreign-originated calls be exchanged for numbers from the new area code; (3) what information in addition to the area code would be conveyed to the called party to ensure that it has accurate and detailed caller ID information; (4) would the new area code be subject to NRUF utilization and forecast reporting; and (5) would these resources be treated as geographic or non-geographic, or pooled or non-pooled, given the impacts to routing.

Should the Commission nonetheless designate a specific area code for foreign-originated calls, extensive customer and consumer education would be required before the area code could be used for this purpose. The designated area code would appear as a 10-digit NANP number (i.e., a U.S. number); without education, consumers will not understand that this area code is being used to identify foreign originated calls. Consumers would need to be educated both as to what the new area code means (that these are calls are originating outside of the U.S.) and what it does not mean (that these calls are improper or fraudulent). To avoid customer confusion, businesses that would be impacted, such as those with international call centers, would also need to educate their customers that legitimate customer service calls may use this area code. This

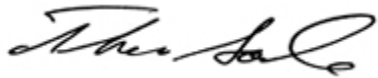
⁸ Notice at ¶79.

consumer education will take significant effort and time and may not be entirely effective because the number will still look like a 10-digit U.S. number and customers may simply not remember the area code is unique to foreign-originated calls.

III. CONCLUSION

ATIS appreciates the opportunity to respond to the Comments submitted in response to the *Notice* and urges the Commission to consider the input above.

Respectfully submitted,

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

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February 3, 2026