

**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	)	

**REPLY TO STATEMENTS IN RESPONSE TO  
PETITION FOR RULEMAKING**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Industry Numbering Committee (INC),<sup>1</sup> is pleased to have the opportunity to reply to statements made by stakeholders in response to the *Petition for Rulemaking* (Petition) filed by Somos, Inc. (Somos). In this Reply, ATIS INC urges the Commission to consider those commenters who, like ATIS, recommend against taking actions related to numbering administration that could delay the industry's all IP transition. ATIS INC also urges the Commission not to expand the scope of this proceeding to address issues unrelated to the proposals addressed in Somos' Petition.

ATIS INC is pleased to see support among commenters for ATIS' view that the IP transition and numbering system updates should not be undertaken simultaneously and that the Commission should minimize industry-wide changes so that service providers can focus on the IP transition.<sup>2</sup> AT&T Services, Inc. (AT&T) for example notes the complexities and risks associated with the overhaul of routing systems and explains that "[a]dding an overhaul of current numbering administration and routing functions and databases would add to this

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<sup>1</sup> The views expressed in these comments are not supported by Somos, Inc., an ATIS INC member.

<sup>2</sup> ATIS Response at p. 4. Redesigning these systems, ATIS INC explained in its comments, 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. *Id.*

complexity and thus to the time needed to complete the transition”.<sup>3</sup> Transaction Network Services, Inc. (TNS) similarly explains that “any restructuring of routing systems is out of sequence with the actual needs of the industry” as “[r]outing only becomes a limiting factor after IP interconnection is widely adopted.”<sup>4</sup> The North American Portability Management LLC (NAPM) also acknowledges the impact that changing numbering systems could have on the IP transition, recommending that, “as the industry and the Commission modernize and transition to all-IP networks, the current NAPM LLC administrative structure must be maintained to support this transition and minimize the complexity of the Commission’s initial goal of IP Interconnection.”<sup>5</sup>

ATIS INC also opposes efforts to expand the scope of this proceeding to address other issues unrelated to the proposals in Somos’ Petition. The Public Service Commission of the District of Columbia and the Maine Public Utilities Commission (DC/ME Commissions), for example, seek “enhancements” to the existing numbering administration rules.<sup>6</sup> These new changes, which include requests for clarification of “Intermediate” and “Aging” numbering resources and for new rules related to the identification of wholesale customers, should not be addressed in this proceeding,

### **III. CONCLUSION**

ATIS INC appreciates the opportunity to reply to the responses submitted to Somos’ Petition and urges the Commission to avoid creating unnecessary additional complexities related to numbering systems that could delay the transition to IP. ATIS INC also urges the Commission

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<sup>3</sup> AT&T Comments at p. 3.

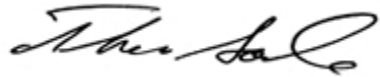
<sup>4</sup> TNS Comments at p. 2.

<sup>5</sup> NAPM Comments at p. 15.

<sup>6</sup> DC/ME Commission Comments at pp. 7-10.

not to expand the scope of this proceeding to address issues unrelated to the proposals addressed in Somos' Petition.

Respectfully submitted,

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

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February 6, 2026

## CERTIFICATE OF SERVICE

I, Jo Seibel, do hereby certify that on this 6th day of February 2026, 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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