

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

In the Matter of	)	
	)	
Advancing IP Interconnection	)	WC Docket No. 25-304
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**Reply Comments**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Industry Numbering Committee (INC), hereby replies to the comments submitted in response to the Federal Communications Commission’s (Commission) October 29, 2025, *Notice of Proposed Rulemaking (NPRM)* in the above-referenced dockets. In these reply comments, ATIS INC urges the Commission to maintain the industry's numbering systems and functional processes while this rulemaking is pending.

**A. Introduction**

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>1</sup>

## **B. The Commission Should Maintain Existing Numbering Systems During IP Transition**

In the *NPRM*, the Commission seeks comment on numbering administration matters related to IP interconnection.<sup>2</sup> ATIS INC urges the Commission to maintain the industry's numbering systems and functional processes while this rulemaking is pending. Significant changes to existing numbering systems should not be undertaken simultaneously with the IP transition. Instead, existing systems should be maintained and revamped incrementally as necessary to create efficiencies and minimize industry-wide burdens so that service providers can focus on the IP transition.

ATIS INC agrees with iconectiv that “the transition to all-IP interconnection, as proposed by the Commission, does not require costly new national numbering and portability databases.”<sup>3</sup> ATIS INC believes that, while some enhanced modifications to existing numbering systems may be necessary to facilitate IP interconnection, redesigning these systems is unnecessary and would only serve to distract from and delay the Commission’s efforts to accelerate the transition of communications networks to all-IP technology. As INCOMPAS explains in its comments, “[b]y building on existing mechanisms and authentication measures, the Commission can promote

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<sup>1</sup> ATIS INC includes subject matter experts from: 10x People, AT&T, Bandwidth, Boost Mobile, Brightspeed Connect Holding LLC, Charter, Comcast, COMsolve, Cox Communications, iconectiv, JSI, Lumen, Mediacom Communications, Inc., Numeracle, Sinch, Somos, TDS, Telnyx, T-Mobile USA, Transaction Network Services, TransUnion, Verizon, and Vonage. While these comments represent the consensus of INC members, Somos does not support the views expressed in these comments.

<sup>2</sup> *NPRM* at ¶52.

<sup>3</sup> iconectiv Comments at p. 2.

routing integrity without creating new or untested systems and without creating unnecessary complexity in the implementation of IP voice interconnection.”<sup>4</sup>

### **C. Conclusion**

ATIS appreciates the opportunity to provide its input to *NPRM* and urges the Commission to maintain the industry's numbering systems and functional processes while this rulemaking is pending. Not only are such changes unnecessary, but they could also delay the IP transition.

Respectfully submitted,



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<sup>4</sup> INCOMPAS Comments at pp. 22-23.