In the Matter of	)	
	)	WC Docket No. 20-174
iconectiv Petition for Competitive	)	WC Docket No. 17-192
Procurement of the Toll-Free	)	CC Docket No. 95-155
Numbering Administrator	)	
	)	

COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Public Notice* released February 6, 2026, in the above-referenced dockets. In the *Public Notice*, the Federal Communications Commission's Wireline Competition Bureau (Bureau) seeks to refresh the record on a petition filed June 11, 2020, by iconectiv, LLC (*Petition*) requesting that the Commission implement a competitive procurement process to select the Toll Free Numbering Administrator (TFNA).[1] As a key developer of industry numbering-related standards and guidelines, including the industry toll free guidelines, ATIS is pleased to provide input on this matter. As explained in these comments, ATIS SNAC supports the proposed use of a competitive procurement process to select the TFNA but urges the Commission to take steps to ensure that any changes to the TFNA will not negatively impact toll free providers and end users regardless of how the TFNA is selected.

I.   BACKGROUND

ATIS is a global standards development and technical planning organization that

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[1] *Petition of iconectiv, LLC for Competitive Procurement of the Toll Free Numbering Administrator Role*, WC Docket No. 17-192, CC Docket No. 95-155 (filed Jun. 11, 2020) at p. 2.

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 and wireline service providers, equipment manufacturers, broadband providers, software developers, VoIP providers, 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 Long-Term Evolution (LTE) and LTE-Advanced wireless specifications.

Industry subject matter experts work collaboratively in ATIS' open industry committees, including ATIS' SMS/800 Number Administration Committee (SNAC). ATIS SNAC resolves issues impacting existing toll free products and services and evolving technologies affecting the future of the toll free industry. SNAC is made up of members representing providers and users of the 800 Service Management System (SMS/800).

II.   COMMENTS

In its *Petition*, iconectiv requests that the Commission implement a competitive procurement process to select the TFNA that would allow the competitive market to determine the cost of toll free administration by awarding the TFNA role and setting the price for toll free administration via a competitive procurement.[2]

ATIS SNAC supports the concept behind the proposed use of a competitive procurement process to select the TFNA. Regardless of how the role of the TFNA is selected, ATIS SNAC urges the Commission to take steps to ensure that any changes to the TFNA will not negatively impact toll

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[2] iconectiv Petition at p. 10.

free providers and end users. In particular, ATIS SNAC urges the Commission to ensure that any new rules do not significantly interfere with or require changes to the way in which providers interface with the TFNA and allows service providers to maintain existing levels of service, security, and functionality, and does not require costly changes. While the Commission's IP Interconnection docket remains pending, the industry's existing numbering architecture and functional processes should remain stable.[3] A change in vendor or administrator, if necessary, can be managed so long as the underlying system design and data structures remain consistent.

ATIS is dedicated to the principles of competition and ATIS SNAC is committed to continuing to support the TFNA, however it is selected. ATIS SNAC provides a forum for stakeholders to discuss toll free issues and to provide recommendations to the TFNA. ATIS SNAC also maintains the *Industry Guidelines for Toll Free Number Administration[4]* and develops standards and procedures for the interaction between Resp Orgs, Customers, and Service Providers. ATIS SNAC has been successfully working with the current TFNA for eleven years to resolve industry issues. During this time, ATIS SNAC has provided important input and guidance about key issues affecting the TFNA. For instance, SNAC requested that the TFNA create a special Resp Org Change (ROC) system to standardize ROC requests and retain the Letter of Authorization (LOA) information for a period of seven years. This input has resulted in significant improvements to TFNA processes and a dramatic decrease in the number of ROC requests needing TFNA assistance.[5] This is but one example of the positive changes that SNAC has recommended to and collaborated with the TFNA to allow the toll free industry to grow and

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[3] *Notice of Proposed Rulemaking* (*NPRM*) released October 29, 2025, in WC Docket Nos. 25-304, 25-208, and 17-97 *See* ATIS Comments in RM-12012 (expressing ATIS INC's view that the IP transition and numbering system updates should not be undertaken simultaneously and should be done in a way that minimizes industry-wide changes).
[4] *Industry Guidelines for Toll Free Number Administration* (ATIS-0417001-005), Approved August 14, 2025.
[5] Somos, the TFNA, has noted that the SNAC input and guidance resulted in an 80% decrease in the number of requests requiring assistance - from 5,735 in the 2016 Tariff Year to 1,021 in the 2019 Tariff Year.

evolve. ATIS SNAC looks forward to continuing to work with the TFNA, regardless of how it is selected, in a similar role to ensure that important industry guidance and input is provided. ATIS' role with regard to toll free numbers is similar to the role it plays in providing industry input and oversight of other key industry numbering resources. ATIS Industry Numbering Committee, for example, addresses and develops solutions for numbering issues and has published a number of public industry resources on the topics of planning, administration, allocation, assignment, and use of NANP numbering resources within the NANP area.[64] Given its deep experience, ATIS stands ready to continue to play a central role in providing industry input and guidance related to management of toll free resources and to support the oversight of the TFNA.

III. CONCLUSION

ATIS appreciates the opportunity to provide input to the *Public Notice*. ATIS SNAC supports the proposed use of a competitive procurement process to select the TFNA but urges the Commission to take steps to ensure that, regardless of how the role of the TFNA is selected, any TFNA changes do not negatively impact toll free providers and end users.

Respectfully submitted,

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[6] A full listing of documents is available from https://www.atis.org/01_committ_forums/INC/documents/.