

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

In the Matter of	)	
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
Telephone Number Requirements for IP- Enabled Service Providers	)	WC Docket No. 07-243
	)	
Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources	)	WC Docket No. 20-67

**COMMENTS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s (Commission) December 19, 2025, *Third Further Notice of Proposed Rulemaking (Third FNPRM)* in the above-referenced dockets. In the *Third FNPRM*, the Commission seeks to refresh the record on reclaiming numbering resources and seeks comment on restricting VoIP numbering authorizations or reevaluating direct access authorizations for entities that appear on the Commission’s Covered List or that have “covered” equipment in their networks and on other restrictions or protections for VoIP numbering authorizations or numbering resources. In these comments, ATIS:

- (1) notes there are benefits to reclaiming numbering resources when the Commission has revoked or terminated VoIP numbering authorizations or when a provider is no longer providing services due to bankruptcy or other critical circumstances;
- (2) explains that the systemic benefits of reclaiming numbering resources from inactive providers or providers that have had their authorization revoked outweighs the risk of disruptions to customers;
- (3) urges the Commission to first exhaust other solutions before considering porting numbers to a designated alternative provider and establishing a numbering partner;
- (4) strongly believes that the Commission should consider other solutions, such as qualified restrictions on new numbering resources or an audit of existing numbering resources,

- before it pursues reclamation;
- (5) agrees generally with the recommendations in the NANC report but notes that, if reclamation is to occur using processes other than those currently in place for abandoned codes, guidelines would need to be developed to address the differences in processes; and
  - (6) notes that there are processes in place if the Commission chooses to pursue reclamations for entities that may threaten national security.

## **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.

These comments reflect input from ATIS' Industry Numbering Committee (INC), which 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. COMMENTS**

In the *Third FNPRM*, the Commission seeks to refresh the record on the feasibility and

impacts of reclaiming numbering resources obtained directly from the Numbering Administrators by interconnected VoIP providers when the Commission has revoked or terminated their VoIP numbering authorization or when the provider is no longer providing services due to bankruptcy or other critical circumstances.<sup>1</sup> ATIS INC notes there are benefits to reclaiming numbering resources in such situations.

Reclamation of Central Office (CO) Codes with assigned numbers involves not only reclamation but also the transfer of those resources to providers that can fulfill Code Holder responsibilities (e.g., maintain default routing and update associated information in industry databases) as specified in ATIS INC guidelines.<sup>2</sup> Companies that assume Code Holder responsibilities for reclaimed numbers have an incentive in maintaining the records accurately for the purposes of service reliability. Reclaiming numbering resources can prevent the stranding of telephone numbers consistent with number conservation by returning unused or underutilized blocks to the pool. Reclamation may further advance the Commission's numbering conservation objectives by improving the accuracy and integrity of Numbering Resource Utilization/Forecast (NRUF) data when affected blocks or codes are reassigned to an active service provider.

Consolidating resources under a service provider that is actively serving customers promotes more accurate utilization reporting and enhances the ability to assess whether specific blocks are candidates for return to the available pool. Greater transparency into block and pooling status strengthens NPA and NANP exhaust projections and supports the Commission's ongoing efforts to ensure the efficient administration of numbering resources in the public interest.

In ATIS INC's view, the systemic benefits of reclaiming numbering resources from

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<sup>1</sup> *Third FNPRM* at ¶29.

<sup>2</sup> *ATIS Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX)*, September 26, 2025 (ATIS-0300119) at Section 11, *Reclamation and Disconnect of Numbering Resources*.

inactive providers or providers that have had their authorization revoked outweighs the risk of disruptions to customers. ATIS INC notes that any transition risks can be mitigated through the application of existing industry processes and/or via Commission action. Commission enforcement actions, for example, can and should be tailored to restrict providers' ability to obtain access to numbering resources while minimizing direct impacts to providers' ability to serve existing customers. If the reclamation of the unassigned numbering resources results in the service provider no longer being able to stay in business, the current abandoned resource process would apply to support those customers.<sup>3</sup> Following these existing processes would also provide opportunity for those service providers to rectify insufficiencies.

The Commission seeks comment on the potential process the Commission might use to reclaim numbers and on ways to operationally facilitate numbering resource reclamation, including whether porting numbers to a designated alternative provider and establishing a numbering partner to maintain service to existing customers could be a viable solution.<sup>4</sup> ATIS INC urges the Commission to first exhaust other solutions before considering these alternatives. While establishing a number partner may seem like a logical approach, it is not viable in all circumstances. For instance, there are situations where the provider whose numbers are being reclaimed is unable to participate in the porting process. This could happen if a service provider goes out of business or terminates service in a state. For example, the Commission's number porting rules and processes were waived in the State of Hawaii to facilitate uninterrupted telephone service due to a provider's decision to abruptly terminate communications services and that provider's actions unreasonably impeding the ability of their customers to port numbers to

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<sup>3</sup> *Id.* at Section 12, *Abandoned Numbering Resources*.

<sup>4</sup> *Third FNPRM* at ¶29.

new providers.<sup>5</sup> ATIS INC strongly believes that the preferred approach is for those agreements to be reached independently based on mutually agreed terms. ATIS INC believes that customers must have the right to select their service provider and the providers must have the right to select their business partners. Therefore, any porting or numbering partner arrangement should be based on mutually agreed terms between the parties.

It is also important to note that porting must occur before reclamation. Service providers currently work with the appropriate regulatory authorities regarding number reclamation. As different service providers provide different products and services, not every service provider has the ability or desire to take over a specific provider's customers. The regulatory authority therefore must determine to whom numbers can be ported and obtain agreement from the customer and new provider(s), at which point the "normal porting process" would be followed.<sup>6</sup>

The Commission asks in the *Third FNPRM* whether there are alternatives to number reclamation that would be less disruptive but also provide adequate safeguards and meaningful enforcement mechanisms to numbering resources.<sup>7</sup> ATIS INC strongly believes that there are less disruptive alternatives that should be considered before pursuing reclamation, namely qualified restrictions on new numbering resources or an audit of existing numbering resources. Number reclamation should be a last resort to be used only if all other options for the service provider to maintain viability have been exhausted.

The conclusions in the NANC's 2024 report,<sup>8</sup> which analyzed similar questions related to

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<sup>5</sup> See June 7, 2024, *Emergency Order* in CC Docket 95-116 (waiving the Commission's number porting rules, requirements, and related processes to facilitate uninterrupted telephone service for customers desiring to port their telephone numbers away from Sandwich Isles Communications, Inc. to a new service provider).

<sup>6</sup> This process would be followed unless the service provider whose numbers are being reclaimed is unable to participate in the porting process as noted above.

<sup>7</sup> *Third FNPRM* at ¶29.

<sup>8</sup> *Direct Access Final Report and Recommendations of the North American Numbering Council*, December 12, 2024.

number reclamation pursuant to the *Second Report and Order*, is another topic on which input is sought in the *Third FNPRM*.<sup>9</sup> ATIS INC generally agrees with the recommendations in the NANC report. As noted in this report, “the process by which reclaimed numbers would be re-allocated to other service providers would be similar to existing porting and resource transfer (e.g., the abandoned code process) processes that occur today, assuming the CO Codes and Thousands-blocks were placed into service; otherwise, they would be returned to NANPA.”<sup>10</sup> If reclamation is to occur using processes other than those currently in place for abandoned codes, ATIS INC notes that guidelines would need to be developed to address the differences in processes.

Finally, the Commission seeks comment on whether it should restrict VoIP numbering authorizations or reevaluate existing authorizations for certain entities that may threaten national security, such as revocations of Section 214 authorizations or use of “covered” equipment.<sup>11</sup> While ATIS INC generally does not address such issues, it notes that there are processes in place if the Commission chooses to pursue reclamations in such circumstances.<sup>12</sup>

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<sup>9</sup> *Third FNPRM* at ¶29.

<sup>10</sup> *Direct Access Final Report and Recommendations of the North American Numbering Council* at p.20.

<sup>11</sup> *Third FNPRM* at ¶30.

<sup>12</sup> *ATIS Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX)* at Section 12, *Abandoned Numbering Resources*.

### III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Third FNPRM* and urges the Commission to consider the input above.

Respectfully submitted,

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

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