

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

In the Matter of	)	
	)	
Combatting Illegal Robocalls Through FCC Numbering Policies	)	WC Docket No. 26-49
	)	
Implementation of TRACED Act Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources	)	WC Docket No. 20-67
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
Telephone Number Requirements for IP- Enabled Service Providers	)	WC Docket No. 07-243

**Comments of the  
Alliance for Telecommunications Industry Solutions**

**Alliance for Telecommunications  
Industry Solutions**

Thomas Goode  
ATIS General Counsel  
1200 G Street, N.W.  
Suite 500  
Washington, DC 20005  
(202) 628-6380

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## SUMMARY

In these comments, ATIS supports the Commission's objective of improving accountability in the numbering ecosystem but believes that several proposed requirements would add administrative burden without materially improving enforcement. In particular, ATIS opposes extending robocall-related certification obligations to all providers that directly receive numbering resources and to resellers, contending that much of the relevant information is already available through existing Commission mechanisms such as the Robocall Mitigation Database and the STIR/SHAKEN framework. ATIS urges the Commission to rely on those existing tools rather than create overlapping obligations with limited incremental benefit.

ATIS notes that the Commission's proposed definition of "reseller" is unclear and overbroad, particularly for layered wholesale arrangements, MVNOs, facilities-based resellers, and non-facilities-based providers. ATIS opposes placing responsibility on wholesale providers to ensure reseller compliance, warning that such an approach would misplace accountability, reduce transparency, and require competitors to collect and exchange burdensome and sensitive operational data. For similar reasons, ATIS opposes dividing intermediate-number reporting into multiple new subcategories, requiring providers of record to gather detailed reseller information, or mandating reporting of specific telephone numbers. Instead, ATIS supports more targeted visibility measures, such as identifying resellers on FCC Form 502, while preserving administrable reporting obligations and clear chains of responsibility.

ATIS urges the Commission to avoid changes that would disrupt legitimate numbering practices without clear anti-robocall gains. It opposes limiting resale of numbering resources to a single level, arguing that such a restriction would reduce competition, increase costs, and disrupt providers serving niche or specialized markets. ATIS explains that number cycling is not inherently illegitimate and should not be treated as a reliable proxy for unlawful robocalling. ATIS urges the Commission to maintain its numbering authority, and to ensure that any sharing of NRUF data with states is protected confidential information, and that implementation timelines for revised reporting requirements should account for the complexity of system and guideline changes.

ATIS urges the Commission to pursue targeted, workable reforms that improve accountability while preserving operational clarity, competitive flexibility, and the effectiveness of existing enforcement tools.

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s (Commission or FCC) March 29, 2026, *Notice of Proposed Rulemaking (NPRM)* in the above-referenced dockets. In the *NPRM*, the Commission seeks comments on proposed changes to the Commission’s telephone numbering policies to further combat illegal robocalls originating from those numbers. In these comments, ATIS is pleased to provide its input on the issues addressed in the *NPRM*.

**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 Administrator (NANPA) and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.

## **II. COMMENTS**

### **A. Expanding Certification and Disclosure Requirements**

In the *NPRM*, the Commission proposes to extend its robocall-related certification obligations to all service providers directly receiving numbering resources from the NANPA, as well as to resellers of telephone numbers, as a one-time obligation, regardless of the means by which they deliver service or the underlying regulatory regime in which they may be authorized to provide service.<sup>1</sup>

ATIS INC opposes the proposed expansion, noting that the proposal would create duplicative and unnecessary burdens. Proposed Section 52.15(l) of the Commission's rules would apply the new certification requirements to service providers (other than interconnected

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<sup>1</sup> *NPRM* at ¶17.

VoIP providers) and to resellers.<sup>2</sup> This would require many providers that are already complying with the relevant Commission robocall-related certification obligations to provide new certifications that simply restate information to which they have already certified. The benefits of this proposal as it applies to these providers would be marginal as much of this information is already in the Robocall Mitigation Database (RMD). In addition, the proposed expansion of certification covers providers that generally already have state level certification requirements. Finally, given the Commission's recent *Further Notice of Proposed Rulemaking* proposing know your upstream provider and other robocalling-related requirements<sup>3</sup> (*KYUP FNPRM*), ATIS INC believes that there are other steps that the Commission may take that may be more effective at combatting illegal robocalling than the proposed extension of the certification obligations.

Instead of expanding the robocall-related certification obligations as proposed in the *NPRM*, ATIS INC recommends that the Commission utilize the existing RMD and STIR/SHAKEN framework and associated due process already put in place by the Commission. Expanding certification requirements with uncertain, marginal enforcement benefits would be much less effective at enhancing wholesale reporting requirements than leveraging the information the Commission already has in the RMD.

Should the Commission nonetheless extend its robocall certification requirements, ATIS INC notes that updates to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG) would be needed to reflect robocall certificate requirements.

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<sup>2</sup> 47 CFR §52.15(1)(2).

<sup>3</sup> *FNPRM*, WC Docket No. 17-97, and CG Docket No. 17-59, released May 21, 2026.

## 1. Definition of Reseller

In the *NPRM*, the Commission proposes to define “resellers of telephone numbers” as all LECs, CMRS providers, and interconnected VoIP providers reselling or seeking to resell services that include the provisioning of geographic numbering resources other than pseudo-ANI.<sup>4</sup>

ATIS INC believes that the proposed definition of “reseller” is unclear and overly broad. Because there are no concrete examples provided in the *NPRM*, the proposed definition would create ambiguity for layered wholesalers (MVNOs) and others, such as Value Add Service Providers (VASP). For example, it is unclear whether this definition is intended to encompass facilities-based or non-facilities-based entities. Also, it is unclear whether an MVNO reseller using telephone numbers or its underlying numbering partner would have to recertify if the service provider is already established in that rate center. It is also unclear whether this is a one-time nationwide certification, or whether recertification is required when expanding into different markets. To the extent that the Commission adopts a definition of reseller, that definition should be consistent with the accountability for and implementation of call authentication that was discussed in the Commission’s *Eighth Report and Order* in WC Docket No. 17-97<sup>5</sup>, the changes being proposed in the *KYUP FNPRM*, and the accountability for numbering. Caution should be taken to avoid being inconsistent with the accountability across Call Authentication, KYUP and numbering.

When considering how to define resellers, ATIS INC believes that it is important to acknowledge the different types of resellers and that some providers may fall into multiple reseller categories. Non-facilities based resellers are providers that own no physical network

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<sup>4</sup> *NPRM* at ¶16.

<sup>5</sup> *Eighth Report and Order*, WC Docket No. 17-97 (released November 24, 2024), at ¶17.

infrastructure; they do not own fiber lines, cell towers, or even switching and routing equipment. Instead, these providers rebrand and sell another provider's service. Those non-facilities based resellers, which include MVNOs, re-billers, traditional resale, etc., generally receive numbers through an on-demand assignment from a numbering partner's inventory. Facilities-based resellers, on the other hand, own and operate their own switching, routing, or processing equipment, which allows them to manage their own traffic and provide unique features. Facilities-based resellers are provided numbers through an on-demand assignment from a numbering partner's inventory and may also be provided an inventory of numbering resources in bulk for their exclusive use.

ATIS INC also notes that obtaining services with numbers on an on-demand (i.e., just-in-time) basis is different than obtaining number resources for inventory purposes. There is a fundamental distinction between a service provider that obtains voice service bundled with telephone numbers on an on-demand basis to serve a specific end user and a provider that obtains numbering resources in bulk (e.g., blocks of 100, 1,000, or more numbers) to establish an available inventory for resale. In the former case, immediate assignment of numbers to end users supports categorizing them as assigned numbers. Alternatively, "buckets" of available numbers from which resellers could pull for later assignment to end users are appropriately categorized as intermediate numbers.

The Commission seeks comment on whether wholesale providers should be responsible for ensuring that resellers of their telephone numbers have submitted certifications and whether the failure of any of their resellers to do so should be grounds for suspension of a wholesale provider's right to obtain further numbering resources.<sup>6</sup> ATIS INC does not support requiring

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<sup>6</sup> *NPRM* at ¶18.

wholesale providers to be responsible for ensuring that resellers of their telephone numbers have submitted certifications. This requirement would not only interject the wholesale provider into managing its competitor's compliance but would also transfer accountability away from the reseller to another provider, misplacing accountability. Moreover, the Commission already has sufficient information to hold resellers accountable, such as the RMD.

The Commission asks whether 30 days would be sufficient time to comply with the proposed new obligations for current providers of record of numbering resources.<sup>7</sup> ATIS INC believes that whether 30 days is sufficient will depend on how the certification is implemented and when it is required and by whom. For example, if it is a one-time checkbox acknowledgement (such as in the NANP Administration System (NAS)), 30 days may be sufficient; if, however, it requires new operational requirements and additional paperwork or if it is required upon market expansion, 30 days may not be sufficient.

## **2. State Law Violations**

The Commission asks if there is a reason to distinguish robocall certification obligations between different types of service providers, stating that state commissions have observed a pattern of holders of Commission-issued interconnected VoIP direct authorizations losing access to new numbering resources by failing to comply with state law yet then continuing to obtain numbering resources indirectly through wholesale providers. ATIS INC is concerned that, without clear guidance from the Commission, states may deny numbering resources for state law violations that are unrelated to the providers' provision of telecommunications services or that numbering resources could be withheld without allowing stakeholders sufficient insight and transparency into the state's determination to revoke access. ATIS INC urges the Commission to

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<sup>7</sup> *NPRM* at ¶23.

maintain its exclusive authority to regulate and administer numbering resources, noting that new state-level requirements could cause confusion, increase costs, and negatively impact the transition to IP.

## **B. Resale Practices**

### **1. Enhancing Wholesale Reporting Requirements**

In the *NPRM*, the Commission seeks comment on assertions made by certain parties that many reporting providers are not following their intermediate number reporting obligations and that there is “lack of consistency and adequacy in the completion of the ‘Notes/Assignee’ field in FCC Form 502” and on any other patterns of NRUF non-compliance.<sup>8</sup> The Commission proposes to split the current intermediate number category into three subcategories – intermediate assigned, intermediate other, and intermediate available.<sup>9</sup> ATIS INC believes it would be confusing and unnecessary to have multiple intermediate number definitions. ATIS INC also disagrees that creating three intermediate number subcategories would reduce the potential for confusion and omissions in NRUF reporting of numbering resources provided to resellers, as the Commission suggests in the *NPRM*.<sup>10</sup> In fact, it would be confusing to create three categories. Potentially, service providers could be required to report on individual telephone numbers among three intermediate statuses. In fact, the NRUF already identifies the numbers that are being used by a provider other than the code/block holder (Form U3, U4.) Establishing a clear understanding of the reseller service provider’s obligation to provide NRUF reports would address the issue expressed in the *NPRM* rather than unnecessarily creating additional number status categories. As such, expanding the intermediate category will not

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<sup>8</sup> *NPRM* at ¶32.

<sup>9</sup> *NPRM* at ¶32.

<sup>10</sup> *NPRM* at ¶36.

incentivize compliance among providers currently neglecting their intermediate numbering reporting obligations.

The Commission further proposes that the provider of record bear the burden of determining the status of its intermediate numbers by obtaining any necessary information from the service providers reselling their numbers.<sup>11</sup> ATIS INC notes that collecting and aggregating information from resellers would be labor intensive and would decrease transparency into the chain of custody of telephone numbers. The dynamic nature of number assignment (including number portability) makes coordinating the aggregation of NRUF information from multiple entities challenging. Additionally, aggregating such information would require proprietary information to be exchanged between competing providers, which could create the potential for disputes.

The Commission proposes to modify FCC Form 502 to create entries for the name and contact information for each reseller's FCC Form 499 Filer ID and, if available, OCN, and seeks comment on whether it is feasible to create a method by which information could be clearly provided when multiple resellers receive numbers in a particular block, such as a means by which individual ranges of numbers within a block could be indicated.<sup>12</sup> ATIS INC notes that identifying the specific numbers is not necessary to establishing chain of custody or accountability and that the quantity of obtained numbers provides sufficient information. Requiring specific numbers creates unnecessary complexity and the potential for confusion as it is common for numbers allocated to resellers not to be in contiguous ranges. However, ATIS INC believes it would be possible to provide regulators added visibility by modifying the FCC Form 502 to create entries to identify resellers.

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<sup>11</sup> *NPRM* at ¶34.

<sup>12</sup> *NPRM* at ¶35.

The Commission asks whether it should adopt additional mandatory reporting subcategories to better track the ways in which numbers are being used.<sup>13</sup> ATIS INC does not believe that there is any need for additional tracking subcategories as providers are already tracking number utilization. The subcategories would not provide insight into numbering utilization; instead, the additional subcategories would only make it more complicated and burdensome for service providers and would not, as the Commission hopes, serve to stem illegal robocalling. It is not feasible to maintain records as to how numbers are used. The use of numbers is generally determined by the end user and may change over time without notice or awareness by the service provider.

ATIS INC also does not support the creation of a specific subcategory to report numbers offered for a trial period or for numbers used for cycling, as proposed in the *NPRM*.<sup>14</sup> A cycling-specific subcategory would be both overinclusive and underinclusive. Instead of creating a mandatory cycling subcategory, the Commission should instead leverage existing “for cause” audit authority under 47 CFR § 52.15(k) to target providers serving customers that exhibit patterns of abuse using number cycling and that are corroborated by traceback data and consumer complaints. Service providers also do not have insight into cycling and trials, which would make it impossible to accurately report numbers used for those purposes. ATIS INC also notes that the NRUF is a snapshot in time and does not capture real time data, therefore would not be an adequate tool to track churn activities, such as number cycling and trials in a way that would combat illegal robocalling.

The Commission also proposes to update the method of calculating the numbering resource utilization level used to determine whether the required 75% utilization threshold for

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<sup>13</sup> *NPRM* at ¶37.

<sup>14</sup> *NPRM* at ¶37.

additional numbering resources has been met and seeks comment on whether intermediate assigned numbers should also be included in calculating utilization levels.<sup>15</sup> ATIS INC believes that the numbers that should be reported as assigned on the U3 and U4 Forms would be the same as if the Commission reclassified them as intermediate assigned. Thus, if the Commission establishes the intermediate assigned numbers subcategory, the numbers in this subcategory should be considered assigned and included when calculating utilization for each reporting entity, regardless of which provider assigned the resources. This would provide the most accurate reporting of the assigned status of numbering resources.

The Commission seeks feedback on how it could ensure the NANPA receives information about numbers provided to resellers and whether such resellers should be required to identify themselves as resellers as well as the source of particular numbers.<sup>16</sup> ATIS INC believes that such resellers should be required to identify themselves as resellers but believes that no entity should have to identify ten-digit numbers; instead, they should only be required to identify resellers to which they provide numbers in a thousands block. Thus, the blocks that the resellers would report on should be sufficient to track the chain of custody of the blocks from which numbers are being used and by what provider.

ATIS INC disagrees that providers of record should bear the burden of collecting information from their resellers.<sup>17</sup> This proposed obligation would diminish the ability to identify a chain of custody for the telephone numbers. Reporting obligations should be limited to facility-based resellers who receive numbers from another service provider. The network providers associated with non-facility-based providers have generally established accountability through

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<sup>15</sup> *NPRM* at ¶38. *See* 47 CFR § 52.15(h).

<sup>16</sup> *NPRM* at ¶39.

<sup>17</sup> *NPRM* at ¶34.

their terms of service and their ability to manage potential nefarious activity associated with those end users. In addition to the terms of service, the facilities-based service provider is also identified by industry data sources (LERG, NPAC) as responsible for the connectivity and accountability of the service. Because facilities-based reseller calls can originate on another provider's network (aside from the numbering partner's network), it is appropriate for the facility-based reseller to be held accountable for reporting those numbers given they are included in their overall inventory. Moreover, because non-facilities-based calls associated with non-facilities-based providers must route to and from that provider's customer using the facility-based provider's network, these resellers should not be held accountable to report an NRUF. ATIS INC again notes that it would be very burdensome for providers of record to collect the data from other providers.

The Commission asks whether, if the NRUF form were adequately revised, it would be possible to cross-check how reporting providers and resellers are reporting the same telephone numbers.<sup>18</sup> ATIS INC notes that the NRUF reports could be cross-checked using the thousands-blocks on each reporting carriers' NRUF. However, cross-checking between filed NRUFs will not always be accurate such as where contaminated blocks have been returned to the pool. This is because a reseller's NRUF would not correspond to any other NRUF as pooled blocks will not have a corresponding code holder NRUF.

The Commission asks whether, if it were to require resellers of telephone numbers to file NRUF reports, non-carrier entities should be included.<sup>19</sup> The Commission would need to clarify the meaning of the term "non-carrier entity" in this context to make this workable. For example,

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<sup>18</sup> *NPRM* at ¶40.

<sup>19</sup> *NPRM* at ¶40.

does a “non-carrier” include an enterprise customer that is not a service provider in its own right but manages its own MLTS solution? ATIS INC recommends the Commission simplify the NRUF reporting requirements and specify that Telecommunications providers as defined in the Commission’s rules should be required to file an NRUF. ATIS INC is unaware of an arrangement where there is a non-communications provider that is not obtaining numbering resources from a telecommunications provider.

The Commission also asks if it would be more efficient to hold LECs, CMRS providers, and interconnected VoIP providers responsible for knowing their customers and gathering adequate data from such customers, rather than to also require non-carrier entities to file NRUF reports.<sup>20</sup> ATIS INC recommends that non-carrier entities should not have to file NRUF reports.

The Commission seeks comment on whether all service providers should be required to provide a backup point of contact.<sup>21</sup> ATIS INC agrees with the Commission that providers with a single user in NAS should be required to provide a backup point of contact; service providers with multiple NAS users should not be required to provide additional backup information.

In the *NPRM*, the Commission asks whether, if a reseller of telephone numbers fails to file NRUF reports, it would be reasonable for the NANPA to withhold additional numbering resources from any affiliates under common ownership or control with such reseller that receive numbers directly from the NANPA or from service provider supplying the numbering resources to the reseller.<sup>22</sup> ATIS INC opposes this proposal because it further confuses the distinctions between facilities-based/wholesale/reseller providers, and unnecessarily creates uncertainty about affiliates' business relationships. In addition, ATIS INC believes that it would be

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<sup>21</sup> *NPRM* at ¶41.

<sup>21</sup> *NPRM* at ¶41.

<sup>22</sup> *NPRM* at ¶41.

unreasonable for NANPA to withhold resources from affiliated companies because affiliates may have no knowledge of or control over the violating affiliate.

The Commission seeks comment on its proposal that any changes or clarifications of reporting would apply to the first NRUF reporting period starting at least 12 months after the effective date of the order promulgating these rules.<sup>23</sup> ATIS INC notes that the implementation period will depend on the complexity of the final rules. Although the Commission acknowledges that changes to NAS as well as to the industry numbering guidelines would be needed to implement its NRUF reporting proposals, ATIS INC notes that service provider systems would also be impacted. These systems have been developed to align with the current reporting structure and are likely to require substantial modifications, which would require more than 12 months to implement.

## **2. Limiting Resale of Numbering Resources to a Single Level**

The Commission seeks comment on whether it should prohibit the resale of numbers beyond a single level to ensure visibility into how numbering resources are being used, and to lessen attenuated relationships between the providers of record of numbers and the retail providers of those numbers.<sup>24</sup> ATIS INC opposes prohibiting the resale of numbers beyond a single level. -Limiting resources to a single level would have broad impacts to the entire industry, limit competitive options, and increase costs to consumers. The anticipated churn associated with migration efforts could significantly impact end users currently assigned these numbers as well as all industry providers. Instead of prohibiting resale beyond a single level, ATIS INC believes the existing NRUF form can and should be used to address the Commission's concern with multi-level resale that establishes a chain of custody associated with numbering resources.

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<sup>23</sup> *NPRM* at ¶43.

<sup>24</sup> *NPRM* at ¶48.

The *NPRM* also asks whether resellers of telephone numbers below the first level perform any uniquely useful and competitive function that is meaningful in the voice communications marketplace.<sup>25</sup> ATIS INC notes that some of these resellers serve niche markets based on demographics such as income, age, location (rural, urban, etc.) and serve industry segments such as financial services, insurance, debt collection, and associated call center services.

The Commission further asks if it should hold the resellers responsible for all violations of the Commission’s rules committed with the numbers they resold.<sup>26</sup> ATIS INC disagrees that resellers should be responsible for all violations; instead, the providers that sign up the end user should be responsible.

### **C. Strengthening Numbering Policies to Combat Robocalls**

#### **1. Addressing Number Cycling**

The Commission asks for comment on whether or how it should address robocalling that uses number “cycling,” noting that the practice can be “particularly nefarious” because calls originating with cycled numbers can receive the highest STIR/SHAKEN attestation level as if they were legitimate calls.<sup>27</sup> The Commission further asks whether the harms of cycling outweigh the risks.<sup>28</sup> ATIS INC disagrees with the Commission’s characterization of number cycling as “nefarious.” Number cycling alone is not a reliable proxy for illegal robocalling as the *NPRM* itself acknowledges that there are legitimate uses of cycling and its usage is fairly

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<sup>25</sup> *NPRM* at ¶49.

<sup>26</sup> *NPRM* at ¶49.

<sup>27</sup> *NPRM* at ¶51.

<sup>28</sup> *NPRM* at ¶56.

common.<sup>29</sup> The Commission should focus on the end user and how it uses number cycling, not on the service provider that provisions services to that end user.

The *NPRM* also asks, if the Commission were to prohibit number cycling, how this practice should be defined and whether there are readily-available statistical indicia of number cycling, “such as a service provider reporting a large quantity of telephone numbers from the same number blocks as disconnected in the Reassigned Numbers Database (RND).”<sup>30</sup> ATIS INC notes that it is not uncommon for large quantities of telephone numbers to be disconnected in the same block and that this activity does not conclusively indicate number cycling. Thus, there is a high risk of false positive conclusions of nefarious number cycling merely based upon meta data.

The Commission seeks input on whether trial numbers are being aged for the minimum 45 days and are being reported in the RND.<sup>31</sup> ATIS INC notes that all disconnected numbers should be aged for a minimum of 45 days and reported in the RND.

Finally, the Commission seeks comment on whether both wholesale providers and their reseller customers should bear responsibility for compliance with number cycling and trial numbers rules or should the responsibility be limited to service providers that receive numbers directly from the NANPA, or to all service providers in the chain.<sup>32</sup> ATIS INC believes that end users should be responsible for compliance since the use of numbers is generally determined by the end user. Wholesale providers and their reseller customers generally do not know if numbers are being used for cycling or trials.

## **2. Removing Administrative Barriers to Stopping Numbering Fraud and Abuse**

The Commission seeks comment on expanding the numbering data available to state

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<sup>29</sup> *NPRM* at ¶54.

<sup>30</sup> *NPRM* at ¶57.

<sup>31</sup> *NPRM* at ¶57.

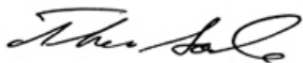
<sup>32</sup> *NPRM* at ¶58.

commissions to enable them to better assist efforts to fight robocalling and other abuses of numbering resources.<sup>33</sup> If the Commission chooses to allow the sharing of NRUF data between states, ATIS INC urges the Commission to maintain its authority over numbering and only provide confidential/proprietary numbering information through appropriate controls necessary to protect the information from intentional or unintentional disclosure and for purposes that are justified and reasonable. State commission actions in this regard should also continue to focus on number resource optimization appropriate to delegated authority under Section 251(e) of the Act. In that regard, ATIS INC notes that state Attorneys General, rather than state commissions, play a more active role in fighting robocalling abuses in many jurisdictions given the underlying criminal or civil fraud activities involved.

### **III. CONCLUSION**

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

Respectfully submitted,



Thomas Goode  
General Counsel  
Alliance for Telecommunications Industry Solutions  
1200 G Street, NW  
Suite 500  
Washington, D.C. 20005  
(202) 628-6380

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<sup>33</sup> *NPRM* at ¶60.