

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reforming Legacy Rules for an All-IP Future	)	WC Docket No. 25-311
	)	
Accelerating Network Modernization	)	WC Docket No. 25-208
	)	

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these reply comments in response to the Federal Communications Commission’s (Commission) *Notice of Proposed Rulemaking (NPRM)* released February 19, 2026, in the above-referenced dockets. In the *NPRM*, the Commission seeks to accelerate network deployment and modernization. ATIS submits these comments to support the recommendation made by Somos, Inc. (Somos) in its comments to the *NPRM* that the Commission should require: (1) service providers to follow the toll free subscriber’s call routing instructions as recorded in the authoritative Toll-Free Numbering (TFN) Registry; and (2) entities providing call-routing dip or query services to return routing instructions consistent with the subscriber’s instructions. Other than network availability problems (e.g., network outages), ATIS SNAC is unaware of any reason that would justify ignoring the routing instructions specified by the toll free subscriber. The proposed recommendation is consistent with recent changes incorporated into the ATIS *Carrier Identification Code (CIC) Assignment Guidelines* (ATIS-0300050).<sup>1</sup>

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<sup>1</sup> This document is available at no charge from: <https://access.atis.org/higherlogic/ws/public/documents?view=>.

## **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 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**

To address instances in which toll free subscribers' routing preferences have been ignored or altered by carriers in the call path, Somos, in its comments to the *NPRM*, urges the Commission to require service providers to follow, to the extent technically feasible and economically reasonable, the toll free subscriber's call routing instructions as recorded in the authoritative TFNRegistry.<sup>2</sup> Somos further recommends that entities providing call-routing dip or

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<sup>2</sup> Somos Comments at p. 6.

query services be required to return routing instructions consistent with the subscriber's instructions.<sup>3</sup>

ATIS SNAC supports Somos' recommendations regarding this matter.<sup>4</sup> As Somos explains in its comments, toll free routing depends on instructions entered by Resp Orgs in the TFNRegistry that are disseminated to the network.<sup>5</sup> ATIS SNAC agrees that these instructions should not be ignored or altered, especially if these changes are being made solely to maximize a routing provider's revenue. In fact, ATIS SNAC is not aware of any reason, including technical<sup>6</sup> or economic feasibility, that would justify ignoring the routing instructions specified by the toll free subscriber. Deviations from subscriber-authorized routing instructions undermine the reliability and transparency of toll free routing. Adopting Somos' recommendations on this matter would improve predictability and network integrity by reducing the risk of unauthorized or inconsistent routing outcomes, support competition by preventing distortions driven solely by intermediary incentives and protect subscriber expectations during the transition to all-IP networks. ATIS SNAC also agrees with Somos that these recommendations would be technology-neutral and would apply equally to SS7-based and IP-based routing.<sup>7</sup> ATIS SNAC recommends the Commission take appropriate enforcement action against entities that ignore the routing instructions specified by the toll free subscriber.

The proposed recommendation is consistent with recent changes incorporated into the *CIC Assignment Guidelines*, which were revised to address the toll-free and non-toll-free routing of CICs. The recently-revised *CIC Assignment Guidelines* explain that routing must adhere to

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<sup>3</sup> *Id.*

<sup>4</sup> ATIS SNAC expresses no opinion about any other matters addressed in Somos' Comments.

<sup>5</sup> Somos Comments at p. 6.

<sup>6</sup> This assumes normal operating conditions and excludes events such as network outages where toll free calls require routing to networks via alternate CICs.

<sup>7</sup> *Id.*

the specifications outlined in the TFN Registry and the NANPA Feature Group D (FGD) CIC Assignment Report and in accordance with applicable tariffs or legal agreements.<sup>8</sup> The guidelines further explain that, when the route associated with the specified CIC is available, the use of alternative routing methods constitutes misuse.<sup>9</sup>

### III. CONCLUSION

ATIS appreciates the opportunity to comment on the *NPRM*. As discussed above, ATIS urges the Commission to require: (1) service providers to follow the toll free subscriber's call-routing instructions as recorded in the authoritative TFN Registry; and (2) entities that provide call-routing dip or query services to return routing instructions consistent with those subscriber instructions.

Respectfully submitted,



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

June 22, 2026

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<sup>8</sup> CIC Assignment Guidelines (ATIS-0300050), Section 1.4.

<sup>9</sup> *Id.*