

**Before the
Federal Communications Commission Washington, DC 20554**

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

**Reply Comments of the
Alliance for Telecommunications Industry Solutions (ATIS)**

Thomas Goode
General Counsel

ATIS
1200 G Street NW
Suite 500
Washington, DC 20005
202-628-6380

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The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these reply comments in response to comments submitted to the Notice of Proposed Rulemaking released March 27, 2026, in the above-referenced dockets.

I. SUMMARY

In these reply comments, ATIS, on behalf of its Industry Numbering Committee (INC):

- Urges the Commission not to adopt the proposed new certification rules, noting that many comments share ATIS’ view that the proposed rules are unnecessary and duplicative;
- Recommends that, if the Commission adopts a one-time certification requirement, it should exempt providers that: “(1) have existing Robocall Mitigation Database (RMD) certifications; (2) possess state certifications such as Certificates of Public Convenience and Necessity; or (3) are incumbent Local Exchange Carriers (LECs);
- Reiterates its opposition to requiring wholesale providers to be responsible for ensuring that resellers of their telephone numbers have submitted certifications;

- Explains that the proposed definition of reseller is unclear and overly broad, a view shared by a number of commenters;
- Notes that many commenters agree with ATIS that Numbering Resource Utilization/Forecast Report (NRUF) is an ineffective and inappropriate robocalling tool;
- Notes that there is significant opposition among commenters to the Commission's proposal to split the current intermediate number category into three subcategories;
- Supports the Commission providing a clearer definition of the intermediate category and increasing training and guidance on how this information should be reflected on the NRUF Form to establish a reconcilable chain of custody of numbering resources and offers to assist the Commission in developing this training;
- Opposes creating a new category for ported numbers because ported out numbers are already included in the assigned category;
- Notes that, despite its strong opposition to the *NPRM*'s proposals to use NRUF as a robocall enforcement mechanism, it stands ready to reevaluate INC guidelines and the NRUF to determine what, if any, changes could be effective at combatting illegal robocalling;
- Urges the Commission to reject its proposal to limit resale beyond a single level, noting broad opposition among commenters to this proposal;
- Notes that several commenters joined with ATIS in explaining that number cycling is not always nefarious and has legitimate uses;
- Opposes expanding state access to NRUF data or permitting access by state attorneys general to this data;
- Notes the uncontested support among commenters for continuing to treat NRUF data as confidential;
- Explains that, while it does not support expanded state access to NRUF data, additional protections and education would be warranted should such access be provided;
- Supports annual training requirements for state commission staff engaged in numbering administration activities, and offers to assist the Commission with development of this education and training;
- Explains its concerns regarding potential delegation of greater authority to state commissions to restrict access to numbering resources, urging the Commission to maintain its authority over numbering;
- Recommends that removal from the Commission's RMD be considered a valid basis on which to withhold and/or reclaim numbering resources;
- Opposes expanding the reasons for withholding numbering resources beyond final Commission or state commission determination of a rule violation; and
- Recommends that suspected fraud be limited to the specific Operating Company Number (OCN) drawing the numbering resources unless there is evidence demonstrating broader misconduct across multiple OCNs.

II. REPLY COMMENTS

A. Expanding Certification and Disclosure Requirements

Expanding Certification. In its comments, ATIS INC opposes the Commission’s proposal to extend robocall-related certification obligations to all service providers directly receiving numbering resources from the North American Numbering Plan Administrator (NANPA), as well as to resellers of telephone numbers.¹ Many comments share ATIS’ view that the proposed new certification rules are unnecessary and duplicative.²

USTelecom explains that any proposal that would require providers to abide by additional or different Commission or NANPA certification or disclosure requirements would result in a “burdensome and/or duplicative thicket of compliance obligations” and urges the Commission to instead get more information prior to moving forward with new rules.³ Lumen Technologies (Lumen) agrees that the proposed expanded certification requirement, while well-intended, is “unnecessarily duplicative of existing processes and certifications.”⁴ BCM One states that a new certification requirement and a structural resale cap “risk imposing costs on compliant providers while failing to capture bad actors – the inverse of what targeted, evidence-based regulation requires.”⁵

ATIS INC disagrees with Baltimore-Washington Telephone Company (BWT), which states in its comments that, “[t]o the extent an entity finds robocall certification obligations burdensome, it is likely there are ongoing robocall concerns with these organizations.”⁶ As other commenters have noted, there would be broad burdens associated with the proposed certification

¹ ATIS Comments at pp.2-3.

² See e.g., Wisconsin Bankers Association Comments at p. 2; Pinger Comments at p. 7, USTelecom Comments at p. 4, Lumen Comments at p. 2, BCM One Comments at p. 4.

³ USTelecom Comments at p.4.

⁴ Lumen Comments at p. 2.

⁵ BCM One Comments at p. 4.

⁶ BWT Comments at p. 2.

requirement. These burdens would not be limited to bad actors or those with ongoing robocall concerns.

ATIS INC agrees with Lumen's recommendation that, if the Commission adopts a one-time certification requirement, it should exempt providers that: "(1) have existing Robocall Mitigation Database (RMD) certifications; (2) possess state certifications such as Certificates of Public Convenience and Necessity; or (3) are incumbent Local Exchange Carriers (LECs)."⁷

Wholesaler Responsibility for Resellers. In its comments, ATIS INC opposes requiring wholesale providers to be responsible for ensuring that resellers of their telephone numbers have submitted certifications.⁸ ATIS INC agrees with USTelecom on this matter. USTelecom notes in its comments that tasking direct access authorization holders with monitoring and reporting resellers' certifications "would unjustifiably burden direct access authorization holders with monitoring their direct competitors' compliance with the Commission's regulations."⁹ The Contact Center Compliance similarly notes that a wholesale provider should not be required to ensure that its reseller customer makes a truthful filing with the Commission, noting that "conditioning the wholesaler's own access to numbering resources on the conduct of a separate entity would penalize the wrong party."¹⁰ The Baltimore-Washington Telephone Company (BWT) also explains that imposing penalties on wholesale providers for the actions of their customers "will dramatically increase wholesale costs, as wholesale providers must build additional infrastructure to police their customers."¹¹

⁷ Lumen Comments at p. 2 (*see also* USTelecom Comments at p. 4, recommending that only resellers that do not have state-level CPCN and franchise reporting requirements should be responsible for such reporting).

⁸ ATIS Comments at pp. 5-6.

⁹ USTelecom Comments at pp. 4-5.

¹⁰ CC Comments at p. 3.

¹¹ BWT Comments at p. 4.

1. Definition of Reseller

ATIS notes in its comments that the definition of reseller proposed in the *NPRM* is unclear and overly broad.¹² ATIS INC's concerns regarding the proposed definition are shared by a number of commenters. NCTA – The Internet & Television Association (NCTA), for example, explains that the proposed definition is overbroad and “fails to distinguish between providers that obtain voice services bundled with telephone numbers on a case-by-case basis, such as mobile virtual network operators (MVNOs), and resellers that obtain numbering resources in bulk.”¹³ Pinger, Inc. (Pinger) agrees that “the proposed definition is overly broad because it turns on a regulatory classification that bears no necessary relationship to robocall risk.”¹⁴ Adem Šaljanin in his comments adds that the proposed “resellers of telephone numbers” definition “reaches categories of entities that fall outside the Commission's Title II jurisdiction as defined by the Act's own terms, including software platform operators, application programming interface aggregators, and unified communications software developers that assign Direct Inward Dial numbers as a technical component within a broader software product.”¹⁵ In the event the Commission proceeds with new standards for resellers, it should clearly distinguish between resellers and end users, looking to Section 69.2 of the Commission's rules as the starting point.

B. Resale Practices

1. Enhancing Wholesale Reporting Requirements

Use of NRUF Reports. The Commission in the *NPRM* asks if there are additional steps it should take to ensure the veracity and accuracy of NRUF reporting that might also later serve as

¹² ATIS Comments at p. 4.

¹³ NCTA Comments at p. 3.

¹⁴ Pinger Comments at p. 8.

¹⁵ Adem Šaljanin Comments at p. 34.

the basis for numbering audits.¹⁶ ATIS INC notes that NRUF was developed as a numbering administration and forecasting tool, not as an enforcement tool. Because the data reflects point-in-time utilization information and good-faith forecasts based on available records, it cannot be relied upon to provide conclusive evidence of a rule violation without additional investigation and context.

Many commenters agree with ATIS that NRUF is an ineffective and inappropriate robocalling tool. Bandwidth in its comments explains that the NRUF “was not designed for, and never intended to be used to track, dynamic number utilization across innovative consumer-driven use cases or combat fraud. It is a snapshot in time, not a continuously updated record, and compiling it imposes a substantial and costly operational burden.”¹⁷ NCTA similarly notes that, “[w]hile certain information in the NRUF report may be tangentially useful for identifying bad actors, these reports were not designed as a robocall enforcement tool.”¹⁸ INCOMPAS further adds that “NRUF reports cannot be submitted frequently enough to keep up with companies specializing in illegal robocalling and the NRUF reports are not integrated with STIR/SHAKEN.”¹⁹

The Commission also asks if it should create an expedited method by which the NANPA, at the direction of the Wireline Competition Bureau (Bureau), could obtain supporting information for a service provider’s usage forecasts.²⁰ ATIS INC notes that forecasts are estimates of future demand that may change. Service providers use a variety of data sources to

¹⁶ *NPRM* at ¶41.

¹⁷ Bandwidth Comments at p. 12.

¹⁸ NCTA Comments at p. 4.

¹⁹ INCOMPAS Comments at p. 4.

²⁰ *NPRM* at ¶41.

create forecasts, including historical data, market trends and upcoming events. These estimates are then modified as necessary throughout the year to address unanticipated events.

NRUF Subcategories. ATIS INC in its comments opposes the Commission’s proposal to split the current intermediate number category into three subcategories – intermediate assigned, intermediate other, and intermediate available – explaining that this would be both confusing and unnecessary.²¹ ATIS INC notes that many commenters join ATIS INC in opposing this proposal.

USTelecom notes, “[a]dding additional categories is unnecessary because service providers’ current records inherently identify the actual holder of the numbering resource.”²² Lumen similarly notes that the additional NRUF subcategories will add complexity without providing meaningful enforcement benefits.²³ NCTA concludes that the *NPRM*’s proposed changes to NRUF reporting would likely increase confusion, have minimal value as a tool for investigating bad actors and little impact on the Commission’s ability to identify bad actors because the NRUF reports still would only cover the numbers directly obtained by the filer from the NANPA with its own OCN.²⁴ Telnyx notes that the proposed three-subcategory structure also fails to account for a large number of use cases, explaining that numbers provisioned for certain services may carry no or sporadic traffic, such as home security systems, medical-alert devices, fall-detection wearables, personal emergency response systems, Internet-of-Things modules (e.g., telematics, fleet management, agricultural sensors, smart-grid metering, smart-watch and connected-health backhaul).²⁵ Finally, the Voice on the Net (VON) Coalition explains that NRUF reporting is not the best alternative to create more visibility and more accountability in the

²¹ ATIS Comments at p. 7.

²² USTelecom Comments at p. 9.

²³ Lumen Comments at p. 3.

²⁴ NCTA Comments at pp. 4-5.

²⁵ Telnyx Comments at pp. 6-7.

number resale market as it would be excessively burdensome and disproportionate to its likely benefits.²⁶

ATIS INC agrees with Lumen that a more effective alternative to the proposed use of the NRUF would be to provide a clearer definition of the intermediate category and to increase training and guidance on how this information should be reflected on the NRUF Form to establish a reconcilable chain of custody of numbering resources.²⁷ ATIS INC would be willing to assist the Commission in developing this training.

Ported Numbers. In their joint comments, the State Commissions raise a number of issues related to ported numbers, claiming that these numbers are currently excluded from the definition of “intermediate numbers,” but are not otherwise identified in the NRUF report.²⁸ ATIS INC notes that ported numbers are accounted for under the Commission's existing rules. Specifically, Section 52.15(f)(1)(iii) of the Commission’s rules addresses numbers ported to another service provider within the definition of “assigned numbers” for NRUF reporting purposes²⁹, and Section 52.15(f)(1)(v) specifically prohibits the categorization or reporting of ported numbers as intermediate.³⁰ Ported numbers are also addressed in Section 2.2.1 of the NANPA NRUF Form 502 Non-Geographic Job Aid.³¹

The State Commissions propose that the Commission create a new category for ported numbers in the NRUF reports.³² ATIS INC opposes creating a new category for ported numbers because ported out numbers are already included in the assigned category. Adding a new

²⁶ VON Comments at p. 7.

²⁷ Lumen Comments at p. 3.

²⁸ State Commissions Comments at p. 8.

²⁹ 47 C.F.R. § 52.15(f)(1)(iii) (definition of “assigned numbers”).

³⁰ 47 C.F.R. § 52.15(f)(1)(v) (definition of “intermediate numbers”).

³¹ Numbering Resource Utilization/Forecast (NRUF) Form 502 Job Aid Reporting Non-Geographic Utilization and Forecast Data (Version: 1.6), Section 2.2.1.

³² State Commissions Comments at p. 9.

category would not assist in mitigating robocalls nor would it assist in identification of specific ported numbers. ATIS INC notes that the State Commissions are incorrect in their belief that the burden to service providers associated with this proposed new category would be minimized because information on ported numbers is already in the Local Exchange Routing Guide (LERG).³³ Information on ported numbers is not in the LERG.

While ATIS INC has serious concerns about the *NPRM*'s proposals to use NRUF as robocall enforcement mechanism, if the Commission nonetheless decides to act on this issue, it should take a more targeted and less burdensome approach, such as adding a dedicated field on the NRUF for resellers to be identified. ATIS INC stands ready to reevaluate its guidelines and the NRUF to determine what, if any, changes could be effective at combatting illegal robocalling.

2. Limiting Resale of Numbering Resources to a Single Level

In its comments, ATIS INC opposes prohibiting the resale of numbers beyond a single level, noting that such a limitation would have broad impacts on the entire industry, limit competitive options, and increase costs to consumers.³⁴ ATIS INC notes there is broad opposition among commenters to the Commission's proposal to limit resale beyond a single level.³⁵

Lumen, for example, notes that "[a] restrictive single-level resale requirement would create significant customer churn and potentially lead to less competition and less innovation and availability of services that serve niche communications markets."³⁶ Telnyx agrees, noting that "[a] single-level resale restriction would cause significant and unjustified market consolidation,

³³ State Commissions Comments at p. 9.

³⁴ ATIS Comments at pp. 13.

³⁵ See e.g., Intelliquent Comments at pp. 17-18, Tata Communications (America) Inc. Comments at pp. 2-5; Responsible Enterprises Against Consumer Harassment, Mutual Benefit Corporation (REACH) Comments at pp. 2-3, BCM One Comments at pp. 7-9, Bandwidth Comments at p. 15, RingBoost Comments at pp. 14-21.

³⁶ Lumen Comments at p. 4.

substantially harm smaller and mid-sized providers, and fail to achieve the Commission’s stated objective of reducing illegal robocalls.”³⁷ Twilio similarly explains that the proposed restriction on sub-assignments would limit legitimate business models, stifle technological innovation, and deprive enterprise users of the advanced and integrated communications tools.³⁸ INCOMPAS notes that the Commission’s proposal to limit the resale of numbering resources to a single level would harm end users by making the overall market for VoIP services less efficient, more costly and less competitive, as fewer providers would be able to achieve efficiencies of scale and scope.³⁹ Other countries have encountered similar challenges associated with sub-resale restrictions, as VON explains that such restrictions “have stifled innovation, favored incumbents, increased costs, and failed to curb fraud...”⁴⁰ USTelecom adds that “[l]imiting resale to a single level would disrupt the market and contradict the [Communications] Act’s intent for the Commission to avoid imposing unreasonable or discriminatory conditions on the resale of communications services.”⁴¹

C. Strengthening Numbering Policies to Combat Robocalls

1. Addressing Number Cycling

In its comments, ATIS INC disagrees with the Commission’s characterization of number cycling as “nefarious,” explaining that number cycling alone is not a reliable proxy for

³⁷ Telnyx Comment at p. 2.

³⁸ Twilio Comments at p. 8.

³⁹ INCOMPAS Comments at p. 14.

⁴⁰ VON Comments at pp. 4-6.

⁴¹ USTelecom Comments at p. 11.

illegal robocalling and that there are legitimate uses of cycling.⁴² Many comments support this view.⁴³

ATIS INC urges the Commission not to prohibit or unnecessarily restrict number cycling. As the Contact Center Compliance (CCC) explains in its comments, “[t]here are legitimate callers for whom rotation is the only available means of preserving the integrity and completion of their lawful calls in the face of inaccurate analytics, and prohibition would harm those callers without reaching the ‘bad actors’, who can readily adjust their methods.”⁴⁴ The Online Lenders Association (OLA) similarly notes that number cycling provides substantial benefits to both consumers and businesses when implemented responsibly and in compliance with applicable laws by improving consumer engagement and call answer rates for legitimate communications and reducing the harmful effects of erroneous call labeling.⁴⁵

2. Removing Administrative Barriers to Stopping Numbering Fraud and Abuse

ATIS INC in its comments urged that, if the Commission chooses to allow state commission access to service provider-specific disaggregated data from other states, it should 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.⁴⁶ Given the challenges described above associated with the proposed use of the NRUF as an enforcement tool as described in the *NPRM*, ATIS INC does not support expanding state access to NRUF.

⁴² ATIS Comments at pp. 14-15.

⁴³ See e.g., Telnix Comments at pp. 8-11; Convoso Comments at pp. 2-3; VON Comments at pp. 10-11; Contact Center Compliance Comments at p. 7; Online Lenders Alliance at p. 3.

⁴⁴ CCC Comments at p. 7.

⁴⁵ OLA Comments at p. 3.

⁴⁶ ATIS Comments at pp. 15-16.

The Commission also asks if state attorneys general should have access to provider-specific disaggregated NRUF data only on request and for certain specific purposes and, if so, what other restrictions should be placed on state attorneys general or other state entities' access to numbering data and how much time should be allowed for implementation.⁴⁷ ATIS INC opposes granting state attorneys general access to provider-specific disaggregated NRUF data. Extending access beyond state commissions to additional state agencies or state attorneys general would increase the risk of data protection issues, including the risk of exposure due to public records requests and data breaches, and unintended competitive disclosures. The risks associated with expanded NRUF access are unnecessary given that service providers are currently subject to state and federal investigative processes, including subpoenas, and there are other databases and sources available to provide information. ATIS INC agrees with NCTA that “[e]nforcement actions targeted at robocalls should remain in the Commission’s purview, and the Commission should not embolden state commissions to take enforcement actions that may misconstrue the reports or otherwise conflict with longstanding federal policy.”⁴⁸

The Commission asks what, if any, additional confidentiality protections should be imposed on such expanded access⁴⁹ and if any limits should be put on state commission access to out-of-state provider-specific disaggregated data.⁵⁰ ATIS INC is pleased to see uncontested support among commenters for continuing treatment of NRUF data as confidential.⁵¹ While ATIS INC does not support expanded state access to NRUF data, if the Commission nonetheless authorized such access, it should continue to treat NRUF data as confidential and to condition

⁴⁷ *NPRM* at ¶63.

⁴⁸ NCTA Comments at p. 8.

⁴⁹ *NPRM* at ¶60.

⁵⁰ *NPRM* at ¶62.

⁵¹ The state commissions also support maintaining confidentiality restriction. See State Commissions Comments at p. 15, Michigan Public Service Commission Comments at p. 6.

state access upon the state having “appropriate protections in place (which may include confidentiality agreements or designation of information as proprietary under state law) that would preclude disclosure to any entity other than the NANPA or the Commission.”⁵² ATIS INC believes that additional protections and education would be warranted for expanded state access and supports annual training requirements for state commission staff engaged in numbering administration activities. ATIS INC strongly believes that NRUF data should only be used to monitor the utilization, and forecast the supply and demand, of telephone numbers within the North American Numbering Plan (NANP). It should not be repurposed for unrelated regulatory, enforcement, or competitive purposes. ATIS INC stands ready to assist the Commission in developing the necessary protections for NRUF data.

The Commission seeks comment on whether and under what circumstances it should delegate to state commissions greater authority to restrict access to numbering resources beyond what is currently in its rules.⁵³ ATIS INC notes that numbers are a national resource and urges the Commission to maintain its authority over this public resource. ATIS INC is concerned that Commission delegation of authority could create inconsistencies in the application of numbering rules and policies. The Commission should reject efforts to expand state commission authority to withhold numbering resources. ATIS INC agrees with VON that any rule that would allow a state to exercise a de facto veto over a provider’s nationwide numbering access would undermine the Commission’s federal jurisdiction.⁵⁴

In the *NPRM*, the Commission seeks comment on whether there are any other additional bases under which the Commission or state commissions should have the ability to direct the

⁵² *Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 99-200 (rel. March 31, 2000), ¶82.

⁵³ *NPRM* at ¶64.

⁵⁴ VON Comments at p. 9.

NANPA to withhold numbering resources.⁵⁵ ATIS INC recommends that removal from the Commission's RMD be considered a valid basis on which to withhold and/or reclaim numbering resources.

The Commission asks whether it and, potentially, state commissions have the discretion to direct the NANPA to withhold numbering resources based on indicia of fraud or misuse of numbering resources that may fall short of a final Commission or state commission determination of a rule violation (for example, the number of tracebacks over a certain period of time).⁵⁶ ATIS INC opposes expanding the reasons for which numbering resource should be withheld. ATIS INC agrees with Bandwidth that “[w]ithholding numbering resources, even on a temporary basis, is a serious sanction” that at a minimum “should require a defined, evidence-based predicate, written notice to the affected provider setting forth the grounds, and an opportunity to respond.”⁵⁷

The Commission also asks in the *NPRM* to what extent suspected fraud may be attributed to an entire operating company enterprise rather than merely the OCN drawing the numbering resources on which fraud is suspected.⁵⁸ ATIS INC recommends that any such determination be limited to the specific OCN involved unless there is evidence demonstrating broader misconduct across multiple OCNs.

⁵⁵ *NPRM* at ¶65.

⁵⁶ *NPRM* at ¶66.

⁵⁷ Bandwidth Comments at p. 20.

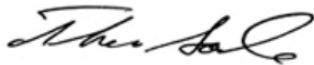
⁵⁸ *NPRM* at ¶66.

III. CONCLUSION

ATIS is pleased to have an opportunity to provide its input to the issues raised in the *NPRM* and comments thereto. While ATIS supports the Commission's goal of combatting robocalling, it believes that many of the proposals in the *NPRM*, including the proposed new certification rules and changes to NRUF, are unnecessary and/or would be ineffective at achieving this goal.

Instead of these proposed changes, ATIS INC recommends that the Commission: look to existing databases and other sources of information; adopt a clearer definition of the intermediate category and increase training and guidance on how this information should be reflected on the NRUF Form; and require annual training and education for state commission staff engaged in numbering administration activities. ATIS INC stands ready to assist the Commission with this training and education and to reevaluate its guidelines and the NRUF to determine what, if any, changes could be effective at combatting illegal robocalling.

Respectfully submitted,



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

July 7, 2026