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August 6, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Ex Parte, CG Docket Nos. 26-52, 17-59, 02-178 and 22-2

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its industry Numbering Committee (INC), submits this letter to address numbering-related issues raised by the Maine Public Utilities Commission (ME PUC) in its Reply Comments in the above-referenced proceedings. ATIS INC believes that the ME PUC's views may reflect an incomplete understanding of existing numbering policies and respectfully urges the Commission not to adopt new numbering restrictions or transparency, accountability, and reporting mechanisms based on these views.

As an initial matter, the ME PUC's sweeping proposals to restrict geographic numbering resources and mandate new accountability mechanisms are outside the scope of the Call Center NPRM. The focus of this proceeding is on consumer protection and call center disclosures, not fundamentally restructuring the North American Numbering Plan (NANP) or creating technically complex, nationwide technology-specific overlay (TSO) area codes. Attempting to resolve broad, industry-wide numbering policies in a targeted call center rulemaking creates procedural challenges and denies interested stakeholders adequate notice and opportunity to comment.

The ME PUC appears to mischaracterize existing Commission number usage restrictions. In its Reply Comments, the ME PUC expresses its belief that "tighter constraints should be put on state geographic numbering resources so that numbers are used for and in the area code they were intended to be used."¹ ATIS INC disagrees that numbering resources may only be used for or in a specific area code or that tighter constraints are warranted. It is well established that businesses may use local numbers to reach out-of-state customers and service provider products (FX, extended CO) have existed for many years to support these businesses. Changing this long-standing principle would have significant and wide-ranging impacts and affect numerous U.S. businesses.

The ME PUC Reply Comments also appear to conflate the terms "wholesale provider" and "intermediate provider." For instance, the ME PUC states that "[m]ost NRUFs filed by wholesalers of telephone numbering resources do not record to whom they are providing wholesale numbers."² ATIS INC notes that, while some wholesale providers are intermediate providers, not all wholesale providers are. Wholesale-only service providers have no direct relationship with end users. They hold or obtain numbering resources directly from the NANPA (or purchase numbers on the resale market) and furnish only those numbers, together with origination and termination services, to downstream service providers. Therefore, there is nothing nefarious about wholesale only providers that do not have a record of end users.

¹ ME PUC Reply Comments at p. 7.

² ME PUC Reply Comments at p. 4.



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ATIS INC agrees with the ME PUC that bad actors tend to disregard Commission rules, including those rules related to the recording and use of telephone numbers as well as the Commission's consumer protection rules. However, it disagrees that this is a basis for tighter constraints on numbering resources. In its Reply Comments, the ME PUC expresses its belief that there is a "strong nexus" between bad NRUF reporting, evasive reporting to state and federal programs, and geographic numbers being used in both offshore call centers and domestically in an uncountable manner.³ In support of this belief, the ME PUC refers to an example provided by another commenter in which different telephone numbers that recently went through the Reassigned Numbers Database (RND) were cycled through by a debt collector.⁴ ATIS INC agrees that this scenario is problematic but notes that this is a TCPA compliance issue, not a numbering usage or reporting issue. If bad actors are ignoring or misusing the RND or otherwise violating the Commission's TCPA rules, this is a matter that should be addressed directly via enforcement of the existing rules, not through tighter constraints on state geographic numbering resources.

Finally, ATIS INC believes that the ME PUC's proposed "guardrails" are unnecessary and ineffective. The ME PUC recommends that the Commission consider whether additional transparency, accountability, and reporting mechanisms are appropriate when geographic numbering resources are used in connection with offshore or out of state customer-contact operations.⁵ ATIS INC disagrees that the new mechanisms are needed or that the proposed "guardrails" would be effective at addressing the issues the ME PUC has raised regarding number cycling. For the reasons discussed above, ATIS INC strongly disagrees with the ME PUC's recommendation that the Commission "[r]eaffirm that geographic area code numbering resources must be used in their designated geographic market." There is simply no requirement that area codes must only be used in their designated market, so it cannot be reaffirmed.

ATIS INC also strongly disagrees with the proposal to create a nationwide technology-specific overlay (TSO) area code that could be used for legitimate telemarketers and Internet of Things telecommunications services.⁶ While this matter was raised in the 2024 NANC report, as the ME PUC notes, the NANC ultimately reached no consensus on this suggestion. As explained in the NANC report, those opposing this concept noted that such a specialized overlay posed a number of technical questions and routing challenges and could cause service providers to undertake a significant amount of effort and funding.⁷ ATIS INC urges the Commission to reject this proposal.

ATIS INC appreciates the opportunity to engage with the Commission on numbering issues and urges the Commission to ensure that state commissions have access to appropriate training. While ATIS INC values the important role that state commissions play in numbering matters, it does not believe that

³ ME PUC Reply Comments at p. 5. Similarly, the ME PUC's reference to a wholesale provider's number that was linked to robocalling is not, as the ME PUC describes it, "a salient example of why the wholesale market needs greater accountability" (ME PUC Comments at p. 6) but rather an example of where enforcement of existing rules may need to be enhanced.

⁴ ME PUC Reply Comments at p. 5.

⁵ ME PUC Reply Comments at p. 9.

⁶ ME PUC Reply Comments at pp. 9-10.

⁷ *Perspectives on the Feasibility and Advisability of Transitioning IoT Device Usage of NANP Numbers to Alternative Addressing and Viability of Potential Options*, Final Report and Recommendations of the North American Numbering Council, November 18, 2024, at p. 19.



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additional restrictions on numbering usage are necessary. If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,

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

Thomas Goode
ATIS General Counsel