

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

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Advanced Methods to Target and Eliminate	)	CG Docket No. 17-59
Unlawful Robocalls	)	

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

The Alliance for Telecommunications Industry Solutions (ATIS),¹ on behalf of its Industry Numbering Committee² hereby submits these reply comments in response to the Federal Communications Commission’s (Commission) May 21, 2026, *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced dockets. In these replies, ATIS INC urges the Commission to address telephone numbering-related issues in a separate consolidated proceeding, rather than separately in multiple rulemakings. ATIS INC also recommends that numbering information not be included in the Robocall Mitigation Database (RMD).

¹ 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 INC is the industry’s open forum for addressing and developing solutions for numbering issues. ATIS 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 also develops guidelines and recommendations that 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.

² See *FNPRM* at ¶66 (seeking input on mechanisms an originating provider can use to establish a customer’s association with a telephone number).

I. The Commission Should Address Numbering Issues in a Separate, Consolidated Proceeding

In the *FNPRM*, the Commission seeks input on a multitude of robocalling issues, including questions related to telephone numbering.³ ATIS INC notes that several commenters support more organized review of the Commission’s robocall rules. The Voice on the Net Coalition (VON), in its comments, explains that there are currently at least eight pending robocall-related proceedings directly impacting this *FNPRM* and asks the Commission to issue a single, omnibus notice of proposed rulemaking to avoid the confusion, implementation complications and delay associated with the release of standalone decisions and “to allow industry to weigh in on the full framework, leading to consistent rules and realistic timeframes.”⁴ T-Mobile USA, Inc. similarly urges the Commission to “proceed holistically across its interconnected robocall proceedings rather than adopting separate, overlapping mandates in each docket” and to “align definitions, sequence implementation, and avoid imposing duplicative obligations that do not materially enhance efforts to mitigate illegal robocalls.”⁵

ATIS INC believes that the Commission should take a similar approach to numbering-related issues. Like robocalling issues, numbering issues are also the subject of a number of different open Commission rulemakings, including this proceeding⁶, the rulemaking on combatting illegal robocalling through numbering policy (*Robocalling Numbering NPRM*),⁷ and

³ See *FNPRM* at ¶66 (seeking input on mechanisms an originating provider can use to establish a customer’s association with a telephone number).

⁴ VON Comments at pp. 1-2.

⁵ T-Mobile Comments at p. 3.

⁶ See *FNPRM* at ¶66 (seeking input on mechanisms an originating provider can use to establish a customer’s association with a telephone number).

⁷ *Notice of Proposed Rulemaking (Robocall Numbering NPRM)* in WC Docket Nos. 26-49, 20-67, 13-97, and 07-243 (released March 29, 2026) (proposing new certification and reporting rules related to numbering).

the rulemaking on improvements to the Commission's Robocall Mitigation Database.⁸ Instead of addressing numbering issues piecemeal in multiple rulemakings, ATIS INC recommends that the Commission address numbering-related issues in a numbering-focused rulemaking. Such an approach would allow for more careful consideration of impacts to numbering, facilitate the identification and avoidance of duplication in rules, and allow for more consistent and effective numbering policies.

A consolidated approach would also enhance the visibility of these changes and help avoid confusion. The current approach of peppering numbering related questions in a variety of different proceedings makes it challenging for those responsible for compliance with the Commission's numbering rules and industry guidelines to keep apprised of changes. Consolidated numbering issues into a single proceeding would also make it easier for the industry to update its guidelines (if necessary) to accommodate any rule changes in a consolidated manner, rather than as a series of different updates. Finally, a consolidated approach would likely be less costly and burdensome to the industry. Implementing multiple changes at one time into service provider systems and processes is likely to be much less expensive than implementing those changes sequentially.

The *FNPRM* also seeks comment on whether mechanisms originating providers can use to establish a customer's association with a telephone number, noting that it sought comment in its *Robocall Numbering NPRM* on how to better track the chain of custody of numbering resources.⁹ As ATIS INC noted in its reply comments to the *Robocall Numbering NPRM*, there are better and more targeted ways to address robocalling than via significant new information

⁸ *Further Notice of Proposed Rulemaking* in WC Docket Nos. 24-213 and 17-97, CG Docket No. 17-59 (released July 23, 2026) (proposing the collection of numbering information from prospective RMD registrants).

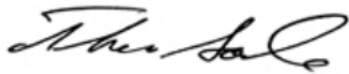
⁹ *FNPRM* at ¶66.

collection or reporting mechanisms. The Commission should not require numbering information to be included in the RMD because numbering information changes frequently. The RMD is therefore not suited to accurately represent this information. However, the removal of a service provider from the RMD would be a valid basis for which to withhold and/or reclaim numbering resources, as ATIS INC noted in its reply comments to the *Robocall Numbering NPRM*.¹⁰ ATIS INC has reclamation processes defined in its guidelines, however a process would need to be established to initiate number reclamation associated with RMD removal.

II. CONCLUSION

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

Respectfully submitted,



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¹⁰ ATIS *Robocall Numbering NPRM* Reply Comments at pp. 13-14.