

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

In the Matter of	)	
	)	
Improving the Effectiveness of the Robocall Mitigation Database	)	WC Docket No. 24-213
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	

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

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Industry Numbering Committee (INC), hereby submits these comments in response to the Federal Communications Commission’s (Commission) July 23, 2026, *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced dockets. In the *FNPRM*, the Commission seeks comment on proposals to strengthen its Robocall Mitigation Database (RMD). ATIS INC urges the Commission not to require providers to submit information on numbering resources in the RMD or to use numbering data as an enforcement validation tool.

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

COMMENTS

A. Providers Should Not Be Required to Submit Numbering Data in the RMD

In the *FNPRM*, the Commission seeks comment on whether it should require providers to submit information about their access to and use of numbering resources in the RMD.¹ The Commission inquires whether it should require providers to disclose, for example, whether or not providers have access to numbers directly or indirectly and, if indirectly, from which providers have they procured numbers, the block(s) or range(s) of numbers to which providers have access, the resellers to which they have resold numbers, and if so, the block(s) or range(s) provided to each reseller, as well as the OCNs for the resellers.²

ATIS INC strongly urges against the Commission requiring providers to submit information on numbering resources in the RMD. There are significant challenges with this proposal. The numbering information would be burdensome for some providers to compile,

¹ *FNPRM* at ¶48.

² *Id.*

particularly larger service providers that have significant numbering resources. Given the dynamic nature of numbering usage data, the data would also quickly become outdated. The data in an RMD submission would be a snapshot in time, accurate only for Service providers constantly updating their number inventories; as a result, any information on numbering resources likely would become outdated almost immediately after submission and almost assuredly would be outdated by the time the Commission has completed its proposed vetting of registrants.

Some numbering data is also subject to confidentiality, as the Commission acknowledges in the *FNPRM*.³ ATIS INC would strongly oppose the release of provider-specific numbering data, similar to Numbering Resource Numbering Utilization/Forecast (NRUF) data. ATIS INC notes that there was broad support among commenters to the Commission's *Robocall Numbering NPRM* to maintain the confidentiality of this information.⁴

The proposed submission of numbering data in the RMD could also unfairly subject service providers to liability associated with RMD filings. The *FNPRM* proposes that failure to submit accurate filing information could subject providers to enforcement actions.⁵ As explained above, the submission of numbering information, even if accurate when the submission is made, will be inaccurate soon after submission, creating a risk of enforcement associated with this data.

While ATIS INC understands the Commission's desire to help deter illegal calls,⁶ it strongly disagrees that including numbering information such as blocks of numbers to which providers have access in the RMD is the appropriate way to accomplish this goal. Moreover, the

³ *Id.*

⁴ See ATIS Reply Comments to *Robocall Numbering NPRM*, WC Docket Nos. 26-49, 20-67, 13-97, and 07-243, at pp 12-13.

⁵ *FNPRM* at ¶80.

⁶ *FNPRM* at ¶48.

Commission already had access to numbering data as ATIS INC explained in its comments to the *Robocall Numbering NPRM*.⁷ The Commission collects detailed data on numbering resource usage through the NRUF reporting process (FCC Form 502). The NRUF already provides the Commission with information on providers' numbering resources, including intermediate numbers and numbers assigned to resellers. The Commission should avoid requiring the submission of the same data in multiple places.

B. Numbering Data Should Not Be Used as an Enforcement Cross-Check

ATIS INC disagrees with the *FNPRM*'s proposals that would use numbering data as an enforcement verification mechanism. The Commission proposes, for example, that RMD filings may be considered materially deficient if they contain information inconsistent with "reliable external sources," including the NANPA.⁸ It also proposes a lack-of-candor certification covering false, misleading, or inaccurate information submitted to the Commission or entities acting under Commission rules or direction, including the NANPA,⁹ and that providers certify compliance with robocall, illegal-call, and numbering-administration rules.¹⁰

ATIS INC does not believe that the proposed cross checking of numbering data would help the Commission achieve its objective of curtailing bad actors. It also notes that it would be extremely difficult to use numbering information as the *FNPRM* proposes, as data such as number blocks and ranges change rapidly making it difficult to do an "apples to apples" comparison of the data for enforcement purposes. ATIS INC strongly believes numbering data should only be used to monitor the utilization, and forecast the supply and demand, of telephone numbers within the NANP and should not be repurposed for unrelated regulatory, enforcement,

⁷ ATIS Comments to *Robocall Numbering NPRM* at p. 7.

⁸ *FNPRM* at ¶80.

⁹ *Id.*

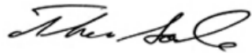
¹⁰ *FNPRM* at ¶22.

or competitive purposes. However, as INC noted in its previous comments to the *Robocall Numbering NPRM* and the *Know Your Upstream Provider (KYUP) FNPRM*, removal of a service provider from the RMD would warrant the withholding and reclamation of numbering resources.¹¹

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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¹¹ See ATIS Reply Comments to *Robocall Numbering NPRM* at p. 14, ATIS Reply Comments to *KYUP FNPRM*, WC Docket No. 17-97, CC Docket No. 17-56, at p. 4.