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October 30, 2026

VIA ELECTRONIC FILING

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

Re: Ex Parte, WC Docket No. 19-99

Secretary Dortch:

On September 22, 2026, NumberBarn LLC (NumberBarn) submitted an ex parte letter in the above-referenced docket. In the letter, NumberBarn makes incorrect statements about the industry numbering guidelines developed by the Alliance for Telecommunications Industry Solution (ATIS) Industry Numbering Committee (INC). ATIS INC is submitting this letter to correct the record.[1]

In its letter, NumberBarn stated that industry guidelines "do not prohibit the sale of a telephone number to an end user, nor the charging of a setup fee for activation of a telephone number."[2] This is incorrect – the ATIS INC guidelines clearly specify that the sale of a telephone number to an end user is prohibited. The ATIS INC Guidelines for the Administration of Telephone Numbers (ATIS-0300070) state that "Telephone Numbers are North American Numbering Plan (NANP) resources that are considered a public resource and are not owned by the assignees. Consequently, the resources *cannot be sold, brokered, bartered, or leased by the assignee for a fee or other consideration*."[3] This restriction is not solely directed at Thousand Blocks or CO Codes assigned to service providers, as NumberBarn claims, but also applies to individual telephone numbers.

NumberBarn's letter also fails to acknowledge the role and importance of the ATIS INC guidelines. NumberBarn states that "ATIS guidelines are just that – guidelines" and that the Commission retains "full jurisdiction over the telephone numbering system in the United States."[4] While ATIS INC agrees that the Commission has authority over numbering, a point

[1] ATIS INC 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. ATIS INC.
[2] NumberBarn Ex Parte at p. 5.
[3] ATIS INC Guidelines for the Administration of Telephone Numbers (ATIS-0300070), Section 1 (emphasis added); These guidelines are available at https://access.atis.org/higherlogic/ws/public/document?document_id=78771.
[4] NumberBarn Ex Parte at p. 6.

ATIS has emphasized in recent comments,[5] NumberBarn appears to ignore the fact the Commission's Part 52 numbering rules specifically acknowledge the important role played by INC guidelines and the Commission has repeatedly confirmed that the guidelines are not voluntary suggestions but enforceable requirements.[6] For example, Section 52.13(b) requires the NANPA to assign and administer numbers consistent with industry guidelines.[7] Moreover, Section 52.15(k)(1) explains that "[a]ll telecommunications service providers shall be subject to 'for cause' and random audits to verify carrier compliance with Commission regulations a*nd applicable industry guidelines relating to numbering administration*."[8]

ATIS INC appreciates the opportunity to provide additional information about its industry numbering guidelines and to clarify that its guidelines do not permit numbering resources to be sold, brokered, bartered, or leased for a fee or other consideration.

If there are any questions, please do not hesitate to contact the undersigned.

Sincerely,



Thomas Goode
ATIS General Counsel

[5] ATIS Comments to *Robocall Numbering NPRM*, WC Docket Nos. 26-49, 20-67, 13-97 and 07-243 (submitted June 8, 2026) at p. 16.
[6] *See, e.g.*, *Second Report and Order*, released December 29, 2000, in CC Docket Nos 96-98 and 99-200 at ¶85-88 (establishing for cause and random audits of compliance with Commission rules, orders and applicable industry guidelines); and *Report and Order,* released June 22, 2025, in WC Docket Nos. 13-97, 04-36, 07-243, 10-90, CC Docket Nos. 95-116, 01-92, 99-200, ¶27 (clarifying that interconnected VoIP providers with direct access to numbering resources are subject to the Commission's numbering rules and to applicable industry guidelines and practices).
[7] 47 CFR §52.13(b).
[8] 47 CFR §52.15(k) (emphasis added). See also 47 CFR 52.13(b) (requiring the NANPA to assign and administer numbers consistent with industry guidelines) and 47 CFR 52.12 (c) (requiring that action by the NANPA and the B&C Agent if ATIS INC issue guidelines that may affect their functions).