

**Federal Communications Commission**

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**North American Numbering Council (NANC)  
Meeting Minutes  
Tuesday, June 25, 2024**

Hon. Karen Charles, Chairwoman  
Bridget Alexander White, Vice Chairwoman  
Christi Shewman, Designated Federal Officer

Contact: NANC@fcc.gov

Contents:

- NANC Councilmember Attendance Record
- Meeting Agenda with Final Vote Record
- Meeting Presentations and Reports
- Public Comment Received in Docket WC 23-1

A recording of the full meeting is available at <https://www.fcc.gov/about-fcc/advisory-committees/general/north-american-numbering-council>.

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**North American Numbering Council (NANC)  
Meeting Minutes  
Tuesday, June 25, 2024**

**NANC Councilmember Meeting Attendance – 2024**

**In attendance yes/no:**

<b>Councilmember – Organization/Representative</b>	<b>June 25</b>
<b>Chairwoman – NARUC – Massachusetts Dept. of Cable and Telecommunications</b> <ul style="list-style-type: none"> <li>• Commissioner Karen Charles</li> </ul>	Y
<b>Vice Chairwoman – Highline – JSI</b> <ul style="list-style-type: none"> <li>• Bridget Alexander White</li> </ul>	Y
<b>10x People, LLC</b> <ul style="list-style-type: none"> <li>• Lisa Marie Maxson</li> <li>• John Nakamura (Alt)</li> </ul>	Y
<b>800 Response Information Services, LLC</b> <ul style="list-style-type: none"> <li>• Heather Barrows</li> </ul>	Y
<b>Ad Hoc Telecommunications Users Committee</b> <ul style="list-style-type: none"> <li>• Susan Gately</li> </ul>	Y
<b>Alliance for Telecommunications Industry Solutions</b> <ul style="list-style-type: none"> <li>• Jackie Wohlgemuth</li> <li>• Thomas Goode (Alt)</li> </ul>	Y
<b>AT&amp;T Inc.</b> <ul style="list-style-type: none"> <li>• Angela DeMahy</li> <li>• George Guerra (Alt)</li> </ul>	Y
<b>Bandwidth</b> <ul style="list-style-type: none"> <li>• Greg Rogers</li> <li>• Lisa Jill Freeman (Alt)</li> </ul>	Y
<b>Brightspeed</b> <ul style="list-style-type: none"> <li>• Jeff Lanning</li> </ul>	Y
<b>Charter Communications</b> <ul style="list-style-type: none"> <li>• Glenn Clepper</li> <li>• Kathy Troughton (Alt)</li> </ul>	Y
<b>Comcast Corporation</b> <ul style="list-style-type: none"> <li>• Matthew Christopher</li> <li>• Beth O’Donnell (Alt)</li> </ul>	Y
<b>Competitive Carriers Association</b> <ul style="list-style-type: none"> <li>• Angela Simpson</li> <li>• Alexandra Mays (Alt)</li> </ul>	Y
<b>CTIA – The Wireless Association</b> <ul style="list-style-type: none"> <li>• Amy Bender</li> <li>• Courtney Tolerico (Alt)</li> </ul>	Y
<b>Electronic Privacy Information Center</b> <ul style="list-style-type: none"> <li>• Chris Frascella</li> </ul>	Y
<b>Google LLC</b> <ul style="list-style-type: none"> <li>• Craig Lennon</li> <li>• Tracy Holick (Alt)</li> </ul>	N

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<b>Councilmember – Organization/Representative</b>	<b>June 25</b>
<b>INCOMPAS</b> • Christopher Shipley	Y
<b>Lumen</b> • Phil Linse	Y
<b>Maine Public Utilities Commission</b> • Michael Johnson	Y
<b>National Association of Attorneys General</b> • Tracy Nayer • Amanda Wentz (Alt)	Y
<b>National Association of State Utility Consumer Advocates</b> • Barrett Sheridan	Y
<b>New Mexico Public Regulation Commission</b> • Brady Tolleson	N
<b>North Dakota Public Service Commission</b> • Victor Schock • Geralyn Schmaltz (Alt)	N
<b>NTCA</b> • Brian Ford • Tamber Ray (Alt)	Y
<b>Peerless Network, Inc.</b> • Virginia Bodyfelt	Y
<b>Public Service Commission of District of Columbia</b> • Lara Howley Walt	Y
<b>Sinch Voice</b> • Allyson Blevins	Y
<b>SIP Forum</b> • Rich Shockey	Y
<b>TDS Telecommunications LLC</b> • Paul Nejedlo	Y
<b>Telnyx</b> • David Casem	Y
<b>T-Mobile</b> • Rosemary Leist • Scott Freiermuth (Alt)	Y
<b>USTelecom</b> • John Bercu	Y
<b>Verizon</b> • Dana Crandall • Dyan Adams (Alt)	Y
<b>Vonage</b> • Colin Brown • Michael Ortega (Alt)	Y

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<b>Special Members (Non-Voting)</b>	
<b>iconectiv LLC</b> <ul style="list-style-type: none"><li>• <b>Chris Drake</b></li><li>• <b>Cathy McMahon (Alt)</b></li></ul>	Y
<b>Somos, Inc.</b> <ul style="list-style-type: none"><li>• <b>Joel Bernstein</b></li><li>• <b>Florence Weber (Alt)</b></li></ul>	Y

A recording of the full meeting, including roll call, is available at <https://www.fcc.gov/about-fcc/advisory-committees/general/north-american-numbering-council>.

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**North American Numbering Council (NANC) Meeting  
Tuesday, June 25, 2024  
Commission Meeting Room, FCC Headquarters  
45 L Street NE, Washington, DC 20554**

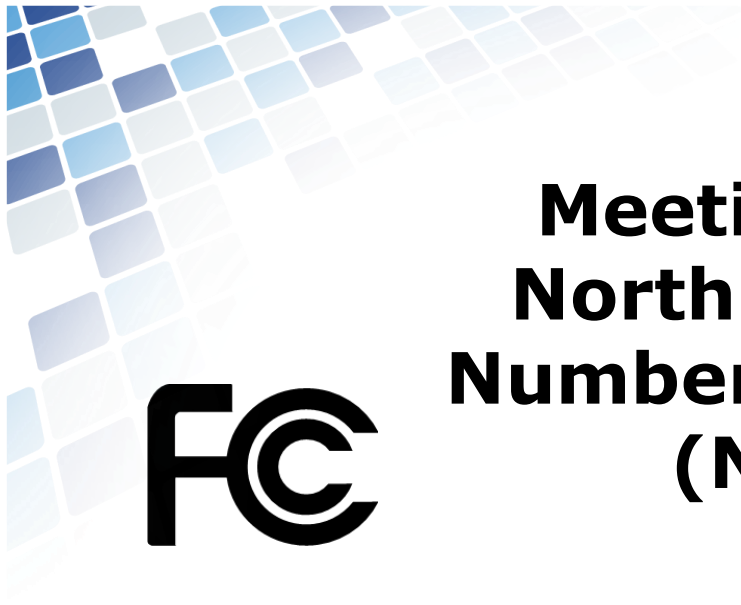
**FINAL VOTE RECORD**

- 2:00 PM**            **Call to Order and Welcome**  
Honorable Karen Charles, NANC Chairwoman  
Christi Shewman, NANC Designated Federal Officer (DFO)  
**[Vote: Not Applicable]**
- 2:05 PM**            **Opening Remarks**  
Sanford S. Williams, Esq., MBA  
Deputy Chief of Staff for Chairwoman Rosenworcel  
Federal Communications Commission  
**[Vote: Not Applicable]**
- 2:15 PM**            **Roll Call, Announcements, and Recent News**  
Christi Shewman, NANC DFO  
Honorable Karen Charles, NANC Chairwoman  
**[Vote: Not Applicable]**
- 2:25 PM**            **Numbering Administration Oversight Working Group (NAOWG)  
Annual Performance Assessment of the North American Numbering Plan  
Administrator (NANPA)**  
Philip Linse, Co-Chair, NAOWG  
**[Vote: Pass]**
- 2:35 PM**            **NAOWG Annual Performance Assessment of the Reassigned Numbers  
Database Administrator (RNDA)**  
Philip Linse, Co-Chair, NAOWG  
**[Vote: Pass]**
- 2:45 PM**            **NAOWG Annual Performance Assessment of the North American Numbering  
Plan (NANP) Billing and Collection Agent**  
Philip Linse, Co-Chair, NAOWG  
**[Vote: Pass]**
- Report of the NANP Billing and Collection Agent**  
                         Heather Bambrough, Welch LLP
- NAOWG Report and Recommendations for the NANP Fund Size Projections  
and Contribution Factor**  
                         Philip Linse, Co-Chair, NAOWG  
                         **[Vote: Pass]**

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- 3:10 PM**            **Toll Free: Future Utilization of Numbers (T-FUN) Working Group  
Report and Recommendation: Assessment of Unassigned 800-Prefix Toll Free  
Numbers and Potential Methods for Number Assignment**  
                         Allyson Blevins, Co-Chair, T-FUN Working Group  
                         [Vote: Pass]
- 3:25 PM**            **The Call Authentication Trust Anchor (CATA) Working Group  
Report and Recommendation Regarding the Regulatory Treatment of  
International Cellular Roaming Traffic**  
                         Jackie Wohlgemuth, Co-Chair, CATA Working Group  
                         [Vote: Motion to Refer to Working Group for Further Deliberations:  
                         Pass]
- 3:40 PM**            **Public Comment and Participation**  
                         Christi Shewman, NANC DFO  
                         [Vote: Not Applicable]
- 3:45 PM**            **Wrap-Up**  
                         Christi Shewman, NANC DFO  
                         [Vote: Not Applicable]
- 3:50 PM**            **Adjourn**



**Meeting of the  
North American  
Numbering Council  
(NANC)**

**June 25, 2024**

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# Call to Order and Welcome

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# Opening Remarks

Sanford S. Williams, Esq., MBA  
Deputy Chief of Staff for Chairwoman Rosenworcel  
Federal Communications Commission

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# Roll Call, Announcements, and Recent News

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**North American Numbering Council (NANC)**  
**Numbering Administration Oversight Working**  
**Group (NAOWG)**

*June 25, 2024*

Co-Chairs:

Philip Linse, Lumen

Lara Walt, Public Service Commission of the District of Columbia

Karen Riepenkroger, T-Mobile

FCC Liaisons:

William Andrie and Rebecca Maccaroni



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## Area of Responsibility

- **Mission:** The Numbering Administration Oversight Working Group oversees the activities and reviews the performances of the North American Numbering Plan Administrator, and the Billing and Collection Agent. It also provides oversight of number portability administration and the Reassigned Numbers Database Administrator.
  
- FCC contract oversight of the following vendors
  - North American Numbering Plan Administrator (NANPA) – Somos
    - NANPA – Administers the allocation of the North American Numbering Plan (NANP) numbering resources, the allocation of 1,000's Block Number Pooling, and the Routing Number Administration (RNA) for p-ANI numbering resources
  - Reassigned Numbers Database Administrator (RNDA)– Somos
    - RNDA – Administers the data that is provided into the RND and the service that is provided to callers.
  - Billing & Collections (B&C) Agent – Welch LLP
    - Bills and Collects from the Telecommunications industry for payment for the functions of the B&C Agent, NANPA, Pooling Administrator (PA), and RNDA Vendors
  
- Oversight of Number Portability



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## **NAOWG Recommendations**

- **NANPA Performance Review**
- **RNDA Performance Review**
- **B&C Agent Performance Review**
- **2024-2025 NANP Fund Budget and Contribution Factor**

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## **2023 Performance Review**

### Background:


- Developed the evaluation consistent with the monthly deliverables. NAOWG evaluates vendor performance monthly.
- Performance rating based upon Met/Not Met.
- Scheduled conference calls to gain industry consensus on evaluation and rating.

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## **2023 NANPA Performance Review**

The NAOWG considered, reviewed and analyzed the following data while compiling overall evaluation of the NANPA (Somos):

- Monthly evaluation matrix overall score
- 2023 team meeting materials (from monthly calls)
- FCC/NANC monthly reports
- NANPA, PA, p-ANI activity
- Service Providers/Others and Regulators survey of NANPA, PA, RNA Performance
- NAOWG observations
- Co-chair and membership interaction with the NANPA (Somos)  9

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## **2023 NANPA Performance Review**

**NANPA rating for 2023 was “MET” and is the recommendation of the NAOWG. This rating is defined below:**

### Met performance requirements

- Met requirements in order to be considered successful
- Performance was competent and reliable
- Decisions and recommendations were within requirements and expectations

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**2023 NANPA Performance Review**

- Somos provided administration of the North American Numbering Plan and associated functions such as Number Pooling and p-ANI administration
- Somos allocated numbering resources to service providers associated with the NANPA's code administration, pooling administration and p-ANI administration functions, pursuant to the terms of its contract and industry guidelines
- Somos provided monthly status reports associated with its effort to combine multiple number administration systems into one system
- Somos provided metrics containing system operation, forecasting, NPA relief support and numbering resource administration activity including trouble ticket detail in a monthly report
- Somos provided quarterly self assessments and prepared a detailed Annual Operational Review for 2023 in an easy-to-follow format



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## **2023 NANPA Performance Review**

Opportunities for Improvement:

- Pursuant to the NANPA Technical Requirements Document (TRD), the NAOWG developed a Performance Improvement Plan (PIP) based in part upon the results of the 2023 performance survey
- Details of the PIP can be found in the 2023 NANPA Performance Evaluation Report

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## **2023 RNDA Performance Review**

The NAOWG considered, reviewed and analyzed the following data while compiling overall evaluation of the RNDA (Somos):

- Monthly evaluation matrix overall score
- 2023 team meeting materials (from monthly calls)
- FCC/NANC monthly reports
- Service Providers and Users survey of RNDA Performance
- NAOWG observations
- Co-chair and membership interaction with the RNDA (Somos)

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## **2023 RNDA Performance Review**

**RNDA rating for 2023 was “MET” and is the recommendation of the NAOWG. This rating is defined below:**

### Met performance requirements

- Met requirements in order to be considered successful
- Performance was competent and reliable
- Decisions and recommendations were within requirements and expectations

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## **2023 RNDA Performance Review**

- Somos provided administration of the FCC's Reassigned Numbers Database pursuant to the terms of its contract
- Somos maintained Service Provider data upload and User query functionality
- Somos provided metrics containing data and query volumes and associated performance including trouble ticket detail in a monthly report
- Somos provided quarterly self assessments and prepared a detailed Annual Operational Review for 2023 in an easy-to-follow format



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## **2023 RNDA Performance Review**

Opportunities for Improvement:

- Pursuant to the RNDA Technical Requirements Document (TRD), the NAOWG developed a Performance Improvement Plan (PIP) based in part upon the results of the 2023 performance survey
- Details of the PIP can be found in the 2023 RNDA Performance Evaluation Report

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## **2023 B&C Agent Performance Review**

The NAOWG considered, reviewed and analyzed the following data while compiling overall evaluation of B&C Agent (Welch LLP):

- Monthly deliverables matrix overall score
- 2023 team meeting materials (from monthly calls)
- FCC/NANC monthly reports
- Customer Service
- Monitoring of receivables
- NAOWG observations
- Co-chair and membership interaction with the B&C Agent (Welch LLP)
- Contribution Factor and Budget related communication/printed material

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## **2023 B&C Agent Performance Review**

**B&C Agent rating for 2023 was “MET” and is the recommendation of the NAOWG. This rating is defined below:**

### Met performance requirements

- Met requirements in order to be considered successful
- Performance was competent and reliable
- Decisions and recommendations were within requirements and expectations

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**2023 B&C Agent Performance Review**

- Welch continued collection of committed funds based upon Reassigned Numbers Database (RND) development costs in addition to the funds that support the North American Number Plan (NANP)
- Welch Initiated collection of reimbursement funds
- Welch provided appropriate accounting of RND and NANP funds and reporting billing and collections into a monthly report
- Welch maintained compliance with the Red Light Rule consistent with FCC 0472
- Welch was subject to routine audits and provided all necessary information for successful on time completion of those audits
- Welch manages multiple banking accounts associated with the collections and distributions of funds associated with the NANP and RND including credit card payment functionality
- Welch prepared a detailed Operational Review for 2023 in an easy-to-follow format
- Welch posts monthly reports to public website <https://nanpfund.com/monthly-fund-reports/>



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Welch LLP. Report  
NANP Budget and Contribution Factor for October 2024 to September 2025

	2024/25	2023/24
NANPA and Pooling Administration	\$ 6,980,336	\$ 6,980,336
Less NANPA Administration costs funded by International Participants		
Canada	150,372	150,285
Other non U.S. member countries	29,312	29,356
<b>Total Contributions by International Participants</b>	<u>179,684</u>	<u>179,641</u>
<b>Net total NANPA Administration and Pooling Costs</b>	6,800,652	6,800,695
<b>Carrier Audits</b>	200,000	200,000
<b>Billing &amp; Collections Agent</b>	392,400	400,500
<b>Data Collection Agent</b>	89,000	83,208
<b>Annual Operations Audit</b>	59,000	56,000
<b>Bank charges</b>	50,000	40,000
<b>Bad debts</b>	20,000	30,000
<b>Interest income</b>	(96,000)	(70,000)
<b>Fees for filing Form 499A late</b>	<u>(55,000)</u>	<u>(40,000)</u>
<b>Total projected disbursements for October 2024 to September 2025</b>	7,460,052	7,500,403
<b>Contingency allowance</b>	<u>1,000,000</u>	<u>1,000,000</u>
	8,460,052	8,500,403
<b>Anticipated surplus at September 30, 2024 (per April 2024 NAOWG report)</b>	<u>(1,693,276)</u>	<u>(234,498)</u>
<b>Net US Carrier Contribution</b>	<u>\$ 6,766,776</u>	<u>\$ 8,265,905</u>
<b>Projected revenue base</b>	<u>\$ 75,523,229,000</u>	<u>\$ 78,970,677,000</u>
<b>Contribution Factor</b>	<u>0.0000896</u>	<u>0.0001047</u>

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**Budget/Contribution Factor**  
**October 2024 – September 2025**

**The NAOWG recommends the proposed Budget and Contribution Factor**

- The contingency fund was determined based upon consideration of potential change orders as well as potential unknown B&C Agent and NANPA contract cost changes.

**2024-2025:**

Balance to be funded is: \$ 7,460,052

- Net US Carrier Contribution requirement: \$6,766,776
  - This includes:
    - (\$ 1,693,276) Surplus from 2023-2024
    - \$1M contingency fund

Revenue base (estimate) – \$ 75,523,229,000

**Contribution factor – 0.0000896**

Prior year (2023-2024):

Revenue base (Actual) – \$ 78,970,677,000

Contribution factor – 0.0001047

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History of NANP Fund Size and Contribution Factor

	Contribution Factor		Revenue Base	% change over prior year	Per Budget				
	Final/Revised #	Original			** Total budgeted expenditures	International contribution	US contributions	Surplus used	Surplus kept
October 2024 to September 2025 (proposed)	0.0000896	0.0000896	78,523,229,000	-4%	8,639,736	179,684	6,766,776	1,693,276	-
October 2023 to September 2024	0.0001047	0.0001047	78,970,677,000	-6%	8,680,044	179,641	8,265,905	234,498	-
October 2022 to September 2023	0.0000853	0.0000853	84,039,180,000	-9%	8,642,536	179,550	7,167,225	1,295,761	-
October 2021 to September 2022	0.0000535	0.0000535	92,699,665,000	-12%	8,635,136	179,200	4,963,718	3,492,218	-
October 2020 to September 2021 ***	0.0001267	0.0001267	105,734,168,000	-14%	16,502,652	203,081	13,393,337	2,906,234	-
October 2019 to September 2020	0.0000908	0.0000908	123,540,363,000	-6%	11,436,421	257,618	11,178,803	-	-
October 2018 to September 2019	0.0000427	0.0000427	131,882,809,000	-9%	7,058,771	132,753	5,639,875	1,286,143	-
October 2017 to September 2018	0.0000518	0.0000518	144,585,828,000	-8%	8,032,418	141,025	7,506,473	384,920	-
October 2016 to September 2017	0.0000368	0.0000368	157,184,628,000	-8%	6,816,306	141,334	5,775,123	899,849	-
July 2015 to September 2016	0.0000387	0.0000387	171,278,983,000	-7%	8,175,707	161,886	6,653,548	1,360,273	-
July 2014 to June 2015	0.0000365	0.0000365	183,925,723,000	-6%	7,165,926	124,400	6,721,854	319,672	-
July 2013 to June 2014	0.0000302	0.0000302	194,881,903,000	-3%	6,896,444	128,592	6,314,070	453,782	-
July 2012 to June 2013	0.0000254	0.0000254	201,642,172,000	-4%	6,187,045	94,923	5,139,392	952,730	-
July 2011 to June 2012	0.0000220	0.0000220	209,009,727,000	-5%	5,857,267	94,944	4,620,882	1,141,441	-
July 2010 to June 2011	0.0000181	0.0000181	219,588,500,000	-7%	5,497,882	96,439	4,034,718	1,366,725	-
July 2009 to June 2010	0.0000107	0.0000107	236,706,172,000	-0.4%	5,348,089	85,415	2,487,497	2,775,177	-
July 2008 to June 2009	0.0000165	0.0000165	237,616,278,000	2%	5,508,944	82,384	3,895,083	1,531,477	1,198,963
July 2007 to June 2008	0.0000193	0.0000193	233,170,743,000	0.4%	6,605,140	84,821	4,530,185	1,990,084	-
July 2006 to June 2007	0.0000210	0.0000210	232,219,745,000	1%	6,922,608	83,238	4,876,926	1,966,444	-
July 2005 to June 2006	0.0000052	0.0000052	230,362,437,000	-2%	6,903,158	84,050	1,127,108	5,692,000	-
July 2004 to June 2005	0.0000210	0.0000210	234,305,625,000	NA	7,026,013	80,468	4,920,418	2,025,127	4,248,064
July 2003 to June 2004 (revised)	0.0000210	0.0000360	NA	NA	9,821,530	114,205	4,902,967	4,804,358	4,000,000

\*\* includes contingency allowance

\*\*\* includes RND creation costs

# Final Factor reflects "Revised" factor if different from Original



Source: Factors and amounts compiled by Welch LLP

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**Numbering Administration Oversight Working  
Group (NAOWG) Members**

**NAOWG Members:**

- ✓10x People
- ✓AT&T
- ✓Bandwidth
- ✓Charter
- ✓Comcast
- ✓Cox
- ✓DC PSC
- ✓EPIC
- ✓Highline
- ✓Lumen
- ✓Maine PUC
- ✓Michigan PSC
- ✓NASUCA
- ✓NetNumber
- ✓New Mexico PRC
- ✓North Dakota PSC
- ✓PACE
- ✓Telnyx
- ✓T-Mobile
- ✓Verizon
- ✓Washington UTC

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## **Future Meetings/Contact Information**

### **2024 Meetings**

Jul. 25	Oct. 24
Aug. 22	Nov. 21
Sep. 26	Dec. 19

*Contact the Co-Chairs for complete meeting or conference call details*

*Philip Linse– [philip.linse@lumen.com](mailto:philip.linse@lumen.com)*

*Lara Walt– [lwalt@psc.dc.gov](mailto:lwalt@psc.dc.gov)*

*Karen Riepenkroger– [karen.s.ripenkroger@tmobile.com](mailto:karen.s.ripenkroger@tmobile.com)*

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**Questions?**

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North American Numbering Council (NANC) Meeting

**Toll-Free: Future Utilization of Numbers (TFUN)  
Working Group Report**

*June 25, 2024*

**Co-Chairs:**

Allyson Blevins, Sinch Voice  
Chris Canter, Verizon

**FCC Liaisons:**

Michelle Sclater and John Visclosky



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Assessment of Unassigned 800-Prefix Toll Free Numbers  
and Potential Methods of Number Assignment

**Objective**

- Evaluate the three categories of 800 numbers in terms of potential auctionability: Sprint, Beehive, and 800 - 855 (TTY) numbers
- Consider the valuation of each category
- Consider and recommend potential assignment methodologies, including competitive bidding

**Valuation and potential auctionability**

- Reviewed history for each category of toll -free numbers: Sprint, Beehive, and 800 -855 (TTY) numbers
- Numbers with an 800 prefix are generally more in -demand than other toll -free prefixes
- High-value numbers were ported from Sprint over multi -year process; only low -value numbers remain available
- Beehive numbers present best vanity options, 800 -MAX and 800 -MAY, as well as repeaters. Numbers never available
- 800-855 (TTY) numbers present low vanity value, as well as repeaters

**Research and Considerations**

- Evaluated eight (8) number -assignment methodologies and variations, including competitive bidding
- Discussed and evaluated each methodology

**Recommendation**

- Open assignment using a first -come, first -served method of number distribution, with a reservation restriction of up to 150 numbers per affiliate for a one -day, 4-hour event
- *Alternative*: first-come, first-served method of number distribution, with reservation limit of 100 numbers per affiliate per 4 -hour event, held on three (3) consecutive days; each category of number is open for reservation on each event over the three -day period



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Assessment of Unassigned 800-Prefix Toll Free Numbers  
and Potential Methods of Number Assignment

Questions?

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Toll-Free: Future Utilization of Numbers (T-FUN) Working  
Group Members

- 800 Response
- Ad Hoc
- ATIS
- AT&T
- Highline
- iconectiv
- Lumen
- NetNumber
- Sinch Voice
- Somos
- Telex
- Verizon

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# **NANC Call Authentication Trust Anchor (CATA) Working Group**

Co-Chairs:

Jackie Wohlgemuth, ATIS

Linda Vandeloop, AT&T

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## **CATA WORKING GROUP (WG) CHARGE**

- The North American Numbering Council's ("NANC") Call Authentication Trust Anchor Working Group, was directed on August 14, 2023, report no later than June 28, 2024, on the regulatory treatment of international cellular roaming traffic (i.e., traffic originated abroad from U.S. mobile subscribers carrying U.S. North American Numbering Plan numbers and terminated in the U.S). The Bureau directs the NANC to address, at a minimum, the following topics:
  - Identify whether and to what extent international cellular roaming traffic is less likely to carry illegal robocalls than other traffic.
  - Identify whether it is technically feasible for providers to segregate or otherwise clearly identify legitimate international cellular roaming traffic for compliance purposes and, if so, by what means. As part of this inquiry, analyze:
    - Whether such segregation or identification is already occurring and, if so, how widespread the practice is and under what circumstances it typically occurs; and
    - Any burdens or barriers to providers identifying or segregating such traffic, including whether those burdens or barriers vary based upon the size of the domestic provider receiving traffic or other factors.
  - The extent to which other countries have anti-robocall or other regulatory regimes in place that require or rely on the segregation or identification of international cellular roaming traffic or that regulate such traffic differently, and the benefits and burdens associated with these foreign regulatory approaches.

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## **CATA WG CHARGE (cont.)**

- Provide recommendations as to whether and, if so, how the Commission should modify its call authentication and/or robocall mitigation rules to account for international cellular roaming traffic. As part of this inquiry:
  - Evaluate the likely benefits and costs associated with any recommended approaches;
  - Analyze whether it would be technically feasible for illegal robocallers to disguise traffic as cellular roaming traffic in order to take advantage of any “lighter touch” regulatory regime for such traffic adopted by the Commission; and
  - Provide recommendations regarding any steps that the Commission and industry could take to prevent illegal robocallers from exploiting any such modifications to the Commission’s robocalling rules.
- Provide an analysis of whether, and if so, how, the segregation or identification of international cellular roaming traffic would affect the ability of gateway providers to authenticate such traffic using STIR/SHAKEN.

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## RECOMMENDATIONS

CATA WG recommends maintaining existing rules for roaming traffic as the cost for any change outweighs the benefits. In addition to continued collaboration between industry and Commission, recommendations include:

- Industry
  - Transition to VoLTE networks for international roaming
  - Continuous monitoring of traffic for illegal robocall trends
- Commission
  - Encourage transition to VoLTE networks for roaming
  - Review process for removing international providers from the Robocall Mitigation Database
  - Continued enforcement of existing rules

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## RESULTS OF ANALYSIS

- International cellular roaming traffic is not a significant source of illegal robocalls.
  - Non-US providers transmitting international cellular roaming traffic were responsible for less than ten percent of the tracebacks of suspected unlawful robocalls that identified a foreign service provider according to USTelecom's Industry Traceback Group (ITG) data.
- Identifying whether any internationally-originated call using a number from the US NANP is from an international roamer will likely require technical solutions as are proposed or in place outside the US, i.e., proxy servers or roaming databases.
- US North American Numbering Plan (NANP) does not have cellular-only number ranges. Networks using national numbering plans which have dedicated cellular-only number ranges are more likely to carry illegal robocalls since such calls using those numbers are protected from proposed blocking.
- While it is technically feasible to separate traffic at the gateway, the cost of doing so likely far outweighs any benefits.
  - The desired outcome is to protect calls which are likely legitimate and to block those calls which are likely illegal. Currently, calls that originate outside of the US using NANP numbers either map to the US service provider's network and are treated like all other calls originating on the service provider's network or they are handed to a US international gateway provider and the gateway provider meets its FCC obligations including certification of its Robocall Mitigation Plan which includes "Know Your Customer" (KYC) measures in the Robocall Mitigation Database.

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**COSTS/BENEFITS OF POTENTIAL ACTION**

- Option 1: Deploy mechanisms for US international gateway providers
  - Benefits: Additional information for call treatment
  - Risks: Possibility of illegal robocallers exploiting the system
  - Costs: Development of systems and processes
  
- Option 2: Maintain existing rules
  - Benefits: Continuity with current FCC regulations
  - Risks: Increased likelihood of blocking legitimate roaming calls
  - Costs: No additional costs compared to the status quo



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**LOGISTICS**

- The CATA WG kicked off September 21, 2023.
- Subsequent meetings were held:

2023	2024
September 28	January 4, 11, 18
October 12, 19, 26	February 1, 15, 22, 29
November 2, 9, 16, 30	March 7, 21, 28
December 7, 14	April 18, 25
	May 2, 9, 16, 20

- Guest presenter provided information for consideration to the report:
  - Huw Sanders, International Trends in Addressing Scam Calls

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MEMBERSHIP

Alliance for Telecommunications Industry Solutions (ATIS)	National Association of Attorneys General (NAAG)
AT&T	National Association of State Utility Consumer Advocates (NASUCA)
Bandwidth	Neustar, Inc., a TransUnion Company
Charter	NTCA-The Rural Broadband Association
Contact Center Compliance (CCC)	Numeracle
CTIA	SIP Forum
Electronic Privacy Information Center (EPIC)	SOMOS
Highline	Telnyx
iconectiv	Transaction Network Services, Inc. (TNS)
INCOMPAS	TransNexus
Lumen	US Telecom
Maine Public Utilities Commission	

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CLOSING

Q & A

Contact information for further questions:

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# Public Comments and Participation

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# Wrap Up

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**Adjourn**

**Public Comment Received in Docket WC 23-1**

Public Comment Received in Docket WC 23-1 on May 14, 2024 (<https://www.fcc.gov/ecfs/search/search-filings/filing/10514020128168> )

Dear members of the North American Numbering Council

I've been thinking about America's 250<sup>th</sup> birthday coming up in a couple years, and had a unique idea on a way it can be observed.

Several years ago, Philadelphia was assigned a new telephone area code 445. It may be too early for a new one, but I think the 776 area code would be perfect for Philadelphia, for obvious reasons as the country's birthplace. For people who still use landlines, they'd be dialing the year of our independence when calling long distance to numbers in that area code..

It may be a while before the city needs an additional area code, but and maybe you could at ensure it gets assigned to Philadelphia for future use.

Thank You  
-Ted Merriman

**Certification of Minutes for Meeting of the North American Numbering Council**

I, Karen Charles, Chairwoman of the North American Numbering Council, state that the above minutes are true and accurate, to the best of my knowledge and belief. Additional details of the meeting may be found in the recorded video, available at <https://www.fcc.gov/about-fcc/advisory-committees/general/north-american-numbering-council> .

\_\_\_\_\_  
Karen Charles  
Chairwoman  
North American Numbering Council

\_\_\_\_\_  
Date