

Final Report and Recommendations of the
North American Numbering Council

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

NANC Toll Free: Utilization of Numbers Working Group
May 14, 2024

Table of Contents

Background	2
Evaluation and recommended number assignment methodology for the former Sprint, Beehive, 800-855 NPA-NXX (TTY) numbers	2
Sprint Numbers History	2
Beehive Numbers History	3
800-855 NPA-NXX (TTY) History	4
Valuation and potential auctionability	4
Profile and assumed value of the three groups of numbers	4
Number Assignment Methodologies	6
Recommendation	7
Acceptable Alternative Recommendation	8
Considered, but not Adopted Alternative Recommendation	8
Alliance for Telecommunications Industry Solutions' Recommendation	8
Conclusion	9
Glossary	10
Correspondence	12

Background

In an August 14, 2023, letter from Trent Harkrader, Chief of the FCC's (Commission) Wireline Competition Bureau to the Honorable Karen Charles, Chairwoman of the North American Numbering Council (NANC), the FCC established the new Toll-Free: Utilization of Numbers (T-FUN) Working Group (WG) to further consider number assignment, auction, and valuation issues for certain Toll Free resources.

The Bureau directed the NANC, via its T-FUN WG, with the tasks of assessing the valuation and numbering assignments for the 800 numbers and to submit a report due by June 28, 2024.

The NANC T-FUN WG was tasked with the following actions:

- Evaluate the three categories of 800 numbers in terms of potential auctionability:
 - 18,837 former Sprint 800 numbers;
 - 9,378 Beehive 800 numbers (all in the 800-629 exchange, none of which have been put into service); and
 - 9,907 former TTY numbers (all in the 800-855 exchange, none of which have been put into service);
- Consider the valuation of each category of 800 numbers; and
- Consider and recommend potential assignment methods, including competitive bidding, for each category of 800 numbers.¹

Evaluation and recommended number assignment methodology for the former Sprint, Beehive, 800-855 NPA-NXX (TTY) numbers

Sprint Numbers History

At the end of 2017, Sprint decided to leave the Toll Free business. In that, Sprint would spare more than 32,000 Toll Free Numbers, of which 18,837 were in the 800 NPA². Sprint disconnected these in November 2017, with a spare date four months later in March 2018.³ During this time, the FCC considered conducting an auction for Toll Free Numbers for the new 833 NPA. The Toll-Free Number Administrator (TFNA) alerted the FCC of these spares in the 800 NPA in the event that these numbers could be available for auction. In a March 5, 2018, letter to the TFNA⁴, then FCC Wireline Bureau Chief

¹ FCC Charge Letter, August 14, 2023, retrieved from

https://www.fcc.gov/sites/default/files/TFUN%20WG%20Referral%20Letter%208%2014%2023%20PDF_0.pdf

² NPA IS Numbering Plan Area, otherwise known as an Area Code

³ 47 CFR 52.103(d) states the maximum time between disconnect and spare is four months.

⁴ Correspondence to J. Bernstein, March 5, 2018, "Disconnected Toll Free Numbers in the 800 Numbering Plan Area (NPA)" attached.

Kris Monteith directed the TFNA to move those numbers to unavailable status⁵ before they were spared and to hold them “as part of the Commission's ongoing efforts to modernize toll free number assignments that are consistent with our statutory mandate, under section 251 (e)(1) of the Communications Act, to make numbers available on an equitable basis.” The numbers have been in unavailable status since, awaiting further FCC instructions.

Beehive Numbers History

The Beehive numbers have a long history that has been litigated at the FCC and in the courts. The controversy stems “from a dispute originating in 1989, at which time Beehive Telephone Company, Inc. (Beehive), an incumbent local exchange carrier, received from Bellcore 10,000 toll free numbers in the “800” numbering plan area with the NXX prefix 629. In 1993, when Bellcore created the centralized database system, Beehive was authorized to act as a RespOrg. In 1994, after Beehive failed to pay service and late payment charges per the terms of the SMS/800Tariff, DSMI revoked Beehive’s RespOrg status and suspended services to Beehive.”⁶

During the pendency of this litigation, the TFNA (then DSMI) placed all the unassigned Beehive numbers in the 800-629 NPA-NXX in unavailable status. These numbers remained under Beehive’s RespOrg ID. There was a total of 9,738 Toll Free Numbers in the 800-629 NPA-NXX in unavailable status.

In February 2017, Beehive informed the TFNA (now Somos) that the company was disconnecting their RespOrg. The TFNA and the FCC then determined that the numbers would move from the Beehive RespOrg ID to the Help Desk RespOrg ID and the numbers could remain there until the FCC further determined whether these numbers would be part of the Toll Free auction experiment. A letter from the FCC was not required, as the numbers were already put in unavailable status by TFNA. The 9,738 Toll Free Numbers in the 800-629 NPA-NXX remain with the Help Desk in unavailable status awaiting further instructions from the FCC.

⁵ In this case, they were moved to a Somos Help Desk RespOrg ID and placed in unavailable status. Unavailable status freezes a Toll-Free Number, so it cannot be ported, spared, put into service, or, in the event the number was in service at the time, change that service.

⁶ Fifth Report and Order in CC Docket No. 95-155, Order in NSD File No. L-99-87, and order in NSD File No. L-99-88, FCC 00-237, released July 5, 2000, at para. 10.

800-855 NPA-NXX⁷ (TTY) History

The FCC had set aside the 800-855 NPA-NXX for TTY⁸ service for the deaf and hard of hearing. This NPA-NXX was administered by the North American Numbering Plan Administrator (NANPA), and not the TFNA. On August 3, 2020, a letter⁹ to then FCC Wireline Bureau Chief Kris Monteith from the Alliance for Telecommunications Industry Solutions (ATIS) Industry Numbering Committee (INC) recommended the sunset of the “800-855 Number Assignment Guidelines (ATIS-0300047)”¹⁰. INC’s letter noted that in 2008, the FCC ordered adopting a uniform Ten-Digit Telephone Numbering System for Internet-based Telecommunications Relay Service (iTRS). That made the 800-855 assignment guidelines moot, and INC recommended that the TFNA take over the administration of the 800-855 NPA-NXX.

As a result of the INC letter, prior to the time the numbers were transferred from NANPA control to the TFNA, on September 1, 2020¹¹, then FCC Wireline Bureau Chief Kris Monteith wrote to the TFNA to set these numbers aside. “We direct Somos to place these [9,912] toll free numbers under the Somos Help Desk RespOrg¹² ID as part of the Commission’s ongoing efforts to modernize toll free number assignments that are consistent with our statutory mandate, under section 251(e)(1) of the Communications Act, to make numbers available on an equitable basis. We also direct Somos to place those numbers in “unavailable” status, as defined in section 52.103(a)(8) of our rules, until further directed by the Commission.” The numbers have been unavailable ever since, awaiting further FCC instructions.

Valuation and potential auctionability

The NANC T-FUN WG reviewed the list of unassigned 800-prefix Toll Free Numbers to determine their valuation and potential auctionability of those numbers.

Profile and assumed value of the three groups of numbers

The Bureau had requested that the TFNA set aside several sets of true 800 numbers (i.e., NPA 800). These included:

⁷ NPA-NXX is otherwise known as a Central Office Code (CO Code) 47 CFR. §52.7(c).

⁸ TTY is a Teletypewriter service for the deaf, hard of hearing, or speech impaired that uses specialized telecommunications equipment that allows people who cannot use a regular telephone due to hearing loss or speech impairment to receive and make telephone calls.

⁹ <https://atis.org/wp-content/uploads/2020/11/INC-2020-00069-final.pdf>.

¹⁰ These guidelines have been sunset; however, they are available from ATIS upon request, if required.

¹¹ Correspondence to J. Bernstein, September 1, 2020, “Return of Toll Free Numbers in the 800-855 Numbering Plan Areas (NPAs)” attached.

¹² The RespOrg is “[t]he entity chosen by a toll-free subscriber to manage and administer the appropriate records in the toll-free Service Management System for the toll-free subscriber.”, <https://www.ecfr.gov/current/title-47/section-52.101>, 47 CFR 52.101.

- 18,837 Sprint numbers in various NPA-NXXs that were going to be spared in a single day back in 2018;
- 9,378 former Beehive numbers in the 800-629 NPA-NXX which have never been issued to an end user and were set aside in 2017; and
- 9,907 TTY (teletypewriter) numbers in the 800-555 NPA-NXX set aside in 2020.

The 800 numbers fall into three categories:

- 1) Former Sprint Numbers
 - a. Quantity 18,837
 - b. Sprint eventually left the Toll Free business via a multi-year process. They had notified all their customers that they were getting out of the business. Customers wishing to retain their numbers took their Toll Free numbers to other RespOrg providers. This group contains some numbers that new businesses would be interested in, but the majority of these numbers would fall into the estimated low-to-nominal value range¹³.
- 2) Former Beehive Numbers
 - a. Quantity 9,378
 - b. All numbers are in the 800-629 exchange. The NXX of 629 allows numbers with alphabetic/vanity permutations using: 6-MNO 2-ABC 9-WXYZ
Popular combinations would include Toll Free vanity numbers starting with: 800-MAX and 800-MAY, for example. Some enterprises may desire these combinations for vanity numbers. The entire 800-629 exchange also includes valuable repeaters, where the number uses the same numbers or sequences to make for a more memorable vanity number, such as: 800-629-0100 or 800-629-2121.
 - c. For these reasons, this group of numbers does have some value, but it is challenging to identify the exact value. However, there are possibly a few numbers in the high-value range, a larger group of numbers estimated to fall in a mid-value range, and the vast majority in the low-to-nominal valued range¹⁴.
- 3) Former 800-855 TTY Numbers
 - a. Quantity 9,907
 - b. All numbers are in the 800-855 exchange. The NXX of 855 allows numbers with permutations using “8-TUV 5-JKL 5-JKL”

¹³ The T-FUN WG examined and estimated the value based on the list of actual TFNs that each group contained. The WG estimated each number’s estimated value based on such factors as a) the numbers having the 800 NPA prefix, which is generally more valuable than other NPA prefixes for Toll-Free; b) vanity potential (e.g., what alphabetic words or prefixes could be spelled out for each available number); and, c) the potential for consumer memorability, such as easy-to-remember repeating numbers or sequences.

¹⁴ *Ibid.*

This combination of three letters does not appear to have the same possibilities to create valuable vanity words as the 800-629 because there are no words (or beginnings of words) that begin with three consonants or with the letter U followed by J, K, or L. This number combination does, have the ability to contain excellent last four digits, such as 800-855-CARS (800-855-2277). The entire 800-855 exchange also includes excellent repeaters using the same numbers or sequences, such as 800-855-1010 and 800-855-2121.

- c. For these reasons, this group of numbers does have value, but potentially less than the 800-629 numbers, because of the inability to turn the 855-prefix numbering exchange into a meaningful vanity word. The estimated value for this group of numbers falls primarily into the low-to-nominal range, with the most value held by the more memorable number sequences¹⁵.

Number Assignment Methodologies

Through its collective discussions, the NANC T-FUN WG evaluated several number assignment methodologies, including those proposed in the charge letter.

The first methodology the WG evaluated was competitive bidding (i.e., an auction), as directed by the Charge Letter. The working foundation was that if an auction were to be the selected methodology, the rules and bidding eligibility criteria and processes would repeat the previously held auction, and that the FCC would be required to describe and confirm those rules and processes¹⁶. The T-FUN WG determined that even with procedural improvements to the competitive bidding process, the cost to implement the auction event would far outstrip the revenues generated by such an auction. While the T-FUN WG does not endorse an auction as a recommended number assignment methodology, if the FCC chooses to proceed with a competitive bidding event, it is essential to ensure a cost-effective event by clarifying and improving this methodology. However, the demand for the numbers must be more robust to support or justify an auction.

The T-FUN WG also considered additional number assignment methods, including several ways of opening the available numbers on a first-come, first-served basis. The T-FUN WG reviewed and discussed the implications of implementing the following methodologies and other variants:

¹⁵ *Ibid.*

¹⁶ The T-FUN WG discussed that if an auction were the selected methodology, the FCC might consider revising the parameters of the auction to improve its impact. For example, the T-FUN WG discussed that the FCC should consider using a straight, single-round sealed bid auction bidding process instead of using a Vickrey bidding method as was previously implemented. The competitive bidding process would be more effective if minimum bid thresholds were implemented, as well as having more clearly defined procedures in cases where two entities submitted identical bids.

- Spare all at once, no limits;
- Spare all at once, with a 150-number limitation;
- Spare all at once, with a 125-number limitation (e.g.; ATIS SNAC recommendation)¹⁷;
- Spare numbers in three separate events, with each event limited to one of the three groups of available TFNs (e.g., the first event would open up only Beehive numbers; a second event would open up the former-Sprint numbers, etc.), limited by 100 TFNs per night per RespOrg (where all RespOrgs under an affiliate are considered to be the same entity);
- Spare numbers in three separate events, with each event open for all three available number groups, limited by 100 TFNs per night per RespOrg (where all RespOrgs under an affiliate are considered to be the same entity);
- Preference ranking; and
- Draft-style number assignment.

Other variations and details were proposed and discussed among the T-FUN WG, including the ATIS SMS/800 Number Administration Committee (SNAC) proposal.

Recommendation

The preferred recommendation of the T-FUN WG aligns with the ATIS SNAC recommendation to the Wireline Competition Bureau on June 28, 2022. SNAC's recommendation proposes that the unassigned 800 NPA TFNs categorized above be released equitably through an allocation method. The allocation method would provide RespOrgs (with all affiliates counted as a single RespOrg¹⁸) an opportunity to reserve up to 125 numbers in a single event. The event would take place on a Saturday for four consecutive hours; the TFNA would determine the specific date and time. The limited reservation amount would apply to all RespOrgs for one day. All TFNs with an 800 NPA would also be considered part of the one-day limit.

The SNAC's 125-number limit proposal was based on an estimated amount of RespOrgs (with affiliates counted as a single RespOrg) that participated in the 833-prefix number release, divided by the total number of available unassigned numbers referenced above. The T-FUN Committee discussed increasing the quantity and ultimately recommends defining it at 150 numbers when a one-day event is held.

¹⁷ *ATIS SNAC Ex Parte dated June 28, 2022 Re: Distribution for Toll-Free Numbers (TFNs) Made Unavailable at the Direction of the Commission.*

¹⁸ *Order, In the Matter of Toll-Free Service Access Codes, CC Docket No. 95-155 (release April 21, 2017).*

After the one-day allocation limit ends, the remaining 800 numbers will be placed back into the spare pool and made available to all RespOrgs. At that time, the allocation of all 800 NPA TFNs will be restored to their previous limits.

Acceptable Alternative Recommendation

An alternative recommendation is to open the reservation for all unassigned 800 NPA numbers categorized above, with up to a 100 number limit per RespOrg (with all affiliates counted as a single RespOrg) across three consecutive days¹⁹; or until these unassigned numbers are all assigned, whichever comes first. All TFNs with an 800 NPA would also be considered part of the one-day limit throughout the three-day period. At midnight following the day of the third event, the remaining unassigned former Sprint, former Beehive, and former TTY TFNs would go into the regular spare pool and would be available to all RespOrgs. At that time, allocation of all 800 NPA TFNs would be restored to their previous limits.

Considered, but not Adopted Alternative Recommendation

Additionally, the group discussed “Preference Ranking” as an alternative. The group considered the value of supporting rank-ordered lists provided by the participants given the interleaving of the requests would provide an equitable access to the available numbers; however, the group consensus was the additional administrative costs to implement this alternative would outweigh the value it may provide. This alternative is documented here for completeness.

Alliance for Telecommunications Industry Solutions’ Recommendation

The recommendations from the T-FUN WG align with the conclusions proposed by the ATIS SNAC. In its June 2022 letter to the FCC, ATIS wrote:

“ATIS SNAC recommends that the Commission consider an equitable allocation method under which the unassigned 800 TFNs would be made eligible for allocation but with an allocation limit of 125 numbers per RespOrg (with all affiliates counted as a single RespOrg). This option would allow almost every RespOrg interested in fresh 800 numbers to obtain them. This allocation would be fair and equitable for all RespOrgs. The easiest and least expensive way to accomplish this would be to apply the limit to the RespOrgs for one day. After the one-day allocation limit

¹⁹ The Toll-Free Number Administrator can determine the start date of the three consecutive days event; however, it is proposed that the 3-day event does not fall on both days of a weekend to reduce the cost of the TFNA in its implementation. For example, having the event fall on a Wednesday, Thursday, and Friday would likely reduce the administration cost because overtime would not likely need to be paid, whereas having the event fall on a Friday, Saturday, and Sunday would likely increase administration costs. Also, the T-FUN WG discussed the potential adverse impacts of a weekend event on the general public in being likely to participate in the 3-day event.

ends, the remaining 800 numbers would be placed back into the spare pool and would be available to all RespOrgs, and the allocation limits would be restored to their previous limits. This one-day limit change should apply to all TFNs reserved that day, not just the ones that have been set aside by request of the Commission. ATIS SNAC notes that this would require the TFNA to publicize this change and to inform RespOrgs of the 125 number limit.”

The primary difference between what the NANC T-FUN WG proposal and the recommendations of the ATIS SNAC is the limit on the quantity of numbers available to RespOrgs on the date of the allocation event. Whereas ATIS SNAC recommends 125 numbers as the limit, the T-FUN WG recommends 150 numbers as the limit. Aside from this, the T-FUN WG aligns with the proposed recommendation from the ATIS SNAC. According to the TFNA, in a previous similar event²⁰, the participation rate was calculated at close to 38% of RespOrgs; this influenced the NANC T-FUN WG to recommend proposing a 150 number limitation, confident that all RespOrgs would get a fair and equitable opportunity to participate without the risk of depleting all of the available numbers.

Conclusion

The members of the T-FUN WG appreciate the opportunity to evaluate and recommend a course of action for the NANC. The T-FUN WG is grateful for the opportunity to share its insights regarding the remaining 800 NPA Toll-Free Numbers with the NANC. We remain committed to offering clarity and addressing any additional inquiries that may arise. We aim to contribute valuable perspectives and foster an informed dialogue.

²⁰ In 2016, approximately 97,000 Toll-Free numbers were released over a five-day period where there was a 100 number limitation enforced each day; however, the limitation was at the RespOrg level instead of at the affiliate level. During the allocation period, approximately 49,000 were reserved by 142 entities, or 30.6% of all active entities. If you discount the RespOrgs that manage less than 100 numbers, the participation was closer to 38%. When the remaining numbers went spare, entities picked them up in minutes; only 34 entities received numbers from the spare pool when it was opened.

Glossary

Federal Communications Commission (FCC)	<p>The Federal Communications Commission regulates interstate and international communications by radio, television, wire, satellite, and cable in all 50 states, the District of Columbia and U.S. territories. An independent U.S. government agency overseen by Congress, the Commission is the federal agency responsible for implementing and enforcing communications law and regulations.</p>
Help Desk	<p>The organization within the TFNA that handles customer-facing transactions and other operations of the SMS/800 TFN Registry.</p>
North American Numbering Plan (NANP)	<p>A numbering architecture in which every station in the NANP area is identified by a unique ten-digit address consisting of a three-digit Numbering Plan Area (NPA) code, a three-digit Central Office (CO) Code (NPA-NXX) of the form NXX, and a four-digit line number of the form XXXX, where N represents the digits 2-9 and X represents the digits 0-9.</p> <p>It is the basic numbering scheme for the telecommunications networks located in Anguilla, Antigua, Bahamas, Barbados, Bermuda, British Virgin Islands, Canada, Cayman Islands, Dominica, Dominican Republic, Grenada, Jamaica, Montserrat, Sint Maarten, St. Kitts & Nevis, St. Lucia, St. Vincent, Turks & Caicos Islands, Trinidad & Tobago, and the United States (including American Samoa, Puerto Rico, the U.S. Virgin Islands, Guam, the Commonwealth of the Northern Mariana Islands) [See also 47 CFR § 52.5 (d)].</p>
North American Numbering Plan Administrator (NANPA)	<p>The Administrator responsible for the neutral administration of North American Numbering Plan (NANP) Numbering Resources, subject to directives from regulatory authorities in the NANP member countries (See 47 CFR § 52.7 (e)).</p>
NPA (Number Plan Area)	<p>The is the 3-digit code that occupies the A, B, and C positions in the 10-digit North American Numbering Plan (NANP) format that applies throughout the NANP area, also called Area Code. NPAs are of the form NXX, where N represents the digits 2-9 and X represents any digit 0-9. In the NANP, NPAs are classified as either geographic or non-geographic. Toll-Free Numbers are non-geographic and current Toll-Free NPAs are: 800, 888, 877, 866, 855, 844 or 833.</p>
NXX (Network Numbering Exchange)	<p>The three digits (in positions 4, 5, and 6) in an 8YY-NXX-XXXX number.</p>

Responsible Organization (RespOrg)	The entity designated to manage and administer a Customer's Toll-Free Number records, in the SMS/800 TFN Registry, pursuant to 47 CFR § 52.101.
SMS/800 Toll Free Number (TFN) Registry	The main operations support system used to create and update Toll-Free records that are then downloaded to network Service Control Points and others for processing Toll-Free Service calls. The system is used by RespOrgs to manage and administer Toll Free Number records.
Toll-Free Number	Toll-Free Numbers are telephone numbers with distinct three-digit codes that can be dialed from landlines with no charge to the person placing the call. Such numbers allow callers to reach businesses and individuals out of the area without being charged a long-distance fee for the call.
Toll-Free Number Administration	The process of assigning, reserving, and releasing Toll-Free Numbers for public use.
Toll-Free Numbering Administrator (TFNA)	The entity appointed by the Commission under its authority pursuant to 47 C.F.R. § 251(e)(1) that provides user support for the Service Management System (SMS) database and administers the SMS/800 TFN Registry database on a day-to-day basis.
TollFree Vanity Number	A Toll-Free telephone number for which the letters associated with the number's digits on a telephone handset spell a name or word of value to the number holder. Vanity numbers also include any numbers in which the holders have a particular interest, economic, commercial, or otherwise. Vanity numbers often spell words or names identifying certain products and services. These numbers are often of value to their Subscribers because they can generate high visibility and consumer recognition when used in advertising.

The glossary terminology was based on the collective knowledge and experience of the T-FUN WG and publicly available industry sources, such as ATIS-0300119 Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines, and www.fcc.gov.

Correspondence



Federal Communications Commission
Washington, D.C. 20554

March 5, 2018

Joel Bernstein
Vice President, Regulatory and Public Policy
Somos, Inc.
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171

Re: Disconnected Toll Free Numbers in the 800 Numbering Plan Area (NPA)

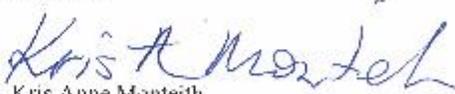
Dear Mr. Bernstein:

It is our understanding that the Responsible Organization Sprint (RespOrg ID SP) disconnected approximately 19,000 toll free numbers in the 800 NPA on November 27, 2017. It is also our understanding that the Somos SMS/800 Toll Free Number Registry will automatically move those numbers into the spare pool of available numbers when the four-month disconnection period set forth in section 52.103(d) of our rules expires on March 27, 2018.

We direct Somos to move those approximately 19,000 toll free numbers to the Somos Help Desk RespOrg ID on or about March 26, 2018 as part of the Commission's ongoing efforts to modernize toll free number assignments that are consistent with our statutory mandate, under section 251(e)(1) of the Communications Act, to make numbers available on an equitable basis. We also direct Somos to place those numbers in "unavailable" status, as defined in section 52.103(a)(8) of our rules, until further directed by the Commission.

Please do not hesitate to contact me should you need additional information.

Sincerely,


Kris Anne Monteith
Chief
Wireline Competition Bureau, FCC



Federal Communications Commission
Washington, D.C. 20554

September 1, 2020

Joel Bernstein
Vice President, Regulatory and Public Policy
Somos, Inc.
2411 Dulles Corner Park, Suite 250
Herndon, VA 20171

Re: Return of Toll Free Numbers in the 800-855 Numbering Plan Areas (NPAs)

Dear Mr. Bernstein:

It is our understanding that approximately 10,000 toll free numbers in the 800 through 855 NPAs will be returned to the Somos SMS/800 Toll Free Number Registry as a result of the sunset of the Alliance for Telecommunications Industry Solutions Industry Numbering Committee's 800-855 Number Assignment Guidelines (ATIS-0300047). It is also our understanding that once Somos assumes management of these 800-855 numbering resources, the SMS/800 Toll Free Number Registry will automatically place these numbers into the spare pool of available numbers.

We direct Somos to place these approximately 10,000 toll free numbers under the Somos Help Desk RespOrg ID as part of the Commission's ongoing efforts to modernize toll free number assignments that are consistent with our statutory mandate, under section 251(e)(1) of the Communications Act, to make numbers available on an equitable basis. We also direct Somos to place those numbers in "unavailable" status, as defined in section 52.103(a)(8) of our rules, until further directed by the Commission.

Please do not hesitate to contact me should you need additional information.

Sincerely,

Kris Anne Monteith
Chief
Wireline Competition Bureau, FCC