

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

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	

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

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Industry Numbering Committee (INC) and SMS/800 Number Administration Committee (SNAC), hereby submits these comments in response to the *Second Notice of Inquiry (Second NOI)*, released July 13, 2017, in the above-referenced docket. ATIS’ comments provide input on the tracking of reassigned numbers, toll-free impacts and the need for a cost-recovery mechanism.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for the technology information, entertainment, and communications industries. ATIS’ nearly 200 member companies are currently working to address 5G, cybersecurity, the All-IP transition, network functions virtualization, smart cities, IoT, emergency services, the network’s evolution to content-optimized networks, quality of service, billing support, operations, unmanned aerial vehicles, and much more. ATIS is accredited by the American National Standards Institute

(ANSI) and is the North American Organizational Partner for the 3rd Generation Partnership Project (3GPP), a founding Partner of the oneM2M global initiative, a member and major U.S. contributor to the International Telecommunication Union (ITU), as well as a member of the Inter-American Telecommunication Commission (CITEL).

ATIS has a significant focus on industry numbering issues and is the developer of key industry numbering guidelines. ATIS' INC, for example, 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), the Number Pool Administration (PA), and the Canadian Radio-Television and Telecommunications Commission (CRTC) in the management of numbering resources. ATIS SNAC identifies, develops, and implements the resolution of issues impacting existing toll-free products and services and evolving technologies affecting future developments in the toll-free industry. ATIS SNAC also maintains the Industry Guidelines for Toll Free Number Administration and is a leader in developing standards and procedures for the interaction between Responsible Organizations (RespOrgs), Customers, and Service Providers.

II. COMMENTS

As an initial matter, ATIS would like to correct a misperception about existing industry capabilities to track reassigned number information. In the *Second NOI*, the Commission presumes that voice providers “already track disconnected and reassigned number information for multiple reasons.”¹ ATIS disagrees with this assumption and maintains that the industry does not in fact generally track when disconnected numbers are reassigned in a way that would be

¹ *Second NOI* at ¶14.

useful or applicable to call authentication. ATIS is unaware of any carrier that already tracks this information for any purpose. Carriers comply with the Commission's rules aimed at ensuring efficient use of telephone numbers by aging disconnected numbers, and then placing appropriately-aged numbers back into the pool of numbers that can be assigned to new customers, but there is no regulatory reason – and ATIS is aware of no business reason – for carriers to undertake the sort of granular tracking of individual numbers that the *Second NOI* contemplates mandating.

The Commission also seeks input on toll-free number reassignments, asking in the *Second NOI* whether the issue of reassignments is a significant problem in the toll-free context.² ATIS does not believe that number reassignments are a significant issue for the toll-free industry for a number of reasons. First, because the toll-free subscriber receiving the call pays for the toll-free call, those subscribers are unlikely to give telemarketers consent to contact them on their Toll-Free Number (TFN). Instead, the subscriber would be likely to give a robocaller consent to make calls on the underlying ten-digit number associated with that TFN, which would not require the subscriber to pay for the robocall. In addition, the number of TFN reassignments is relatively small because the vast majority of TFNs are used by businesses, and anecdotal evidence shows there is very little turnover in business TFNs.

Finally, the Commission asks whether voice service providers should be compensated for reporting reassigned number information.³ ATIS maintains that there should be a mechanism that would allow service providers to recover associated costs and be compensated for reporting reassigned number information. The cost causers – in this case, the robocallers seeking better

² *Second NOI* at ¶11.

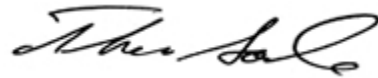
³ *Second NOI* at ¶21.

Telephone Consumer Protection Act compliance tools – should pay for the costs of any new government-mandates.

III. CONCLUSION

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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August 28, 2017