March 5, 2026

FCC FACT SHEET*

Combatting Illegal Robocalls Through FCC Numbering Policies

Combatting Illegal Robocalls through FCC Numbering Policies, Implementation of TRACED Act Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources, Numbering Policies for Modern Communications, Telephone Number Requirements for IP-Enabled Service Providers,

Notice of Proposed Rulemaking – WC Docket Nos. 26-49, 20-67, 13-97, 07-243

Background: In this Notice of Proposed Rulemaking, the Commission would seek comment on and evaluate whether to adopt changes to its numbering policies with respect to how assigned numbering resources are utilized, reported, and resold by service providers as part of its continuing effort to combat illegal robocalls. The Notice would explore and propose a broad array of solutions to strengthen the Commission's numbering requirements and policies, particularly as they relate to resellers that use numbering resources to engage in some of the most extensive illegal robocalling schemes.

What the Notice Would Do:

- Propose to further extend the Commission's robocall certification requirements that are currently applicable to interconnected VoIP providers with direct access to numbers to all service providers that receive numbering resources directly from the North American Numbering Plan Administrator, and also to resellers.
- Seek comment on proposals to modify the number utilization reporting requirements in the numbering resource utilization/forecast form to aid robocall enforcement efforts, obtain more granular information regarding utilization, better detect irregularities, and inform numbering policy development.
- Seek comment on restricting numbering resale to a single level to avoid masking the parties in interest that may be responsible for illegal robocalls, as well as the parties with relevant data, which can occur when there are multiple levels of resale.
- Seek comment on how the Commission's numbering policies can and should address illegal robocallers that rely on number "cycling"—going through large quantities of telephone numbers on a rotating, or single-use basis to evade robocall detection.
- Seek comment on new ways in which the Commission, with assistance from the states and the NANPA, can better identify fraudulent use and misuse of telephone numbers.
- Seek comment on other changes that could safeguard against abuse of numbering resources to promote efficient use of finite numbering resources and to further deter robocalling.

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*This document is being released as part of a "permit-but-disclose" proceeding. Any presentations or views on the subject expressed to the Commission or its staff, including by email, must be filed in WC Docket Nos. 26-49, 20-67,13-97, and 07-243, which may be accessed via the Electronic Comment Filing System (https://www.fcc.gov/ecfs). Before filing, participants should familiarize themselves with the Commission's *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. *See* 47 CFR § 1.1200 *et seq*.

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

In the Matter of	)	
	)	
Combatting Illegal Robocalls Through FCC Numbering Policies	)	WC Docket No. 26-49
	)	
	)	
Implementation of TRACED Act Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources	)	WC Docket No. 20-67
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
Telephone Number Requirements for IP-Enabled Service Providers	)	WC Docket No. 07-243

NOTICE OF PROPOSED RULEMAKING*

Adopted: [] **Released: []**

Comment Date: (30 days after date of publication in the Federal Register)
Reply Comment Date: (60 days after date of publication in the Federal Register)

By the Commission:

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* This document has been circulated for tentative consideration by the Commission at its March 26, 2026 open meeting. The issues referenced in this document and the Commission's ultimate resolutions of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public's ability to understand the nature and scope of issues under consideration, the public interest would be served by making this document publicly available. The Commission's ex parte rules apply and presentations are subject to "permit-but-disclose" ex parte rules. See, e.g., 47 CFR §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission's ex parte rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. See 47 CFR §§ 1.1200(a), 1.1203.

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I. INTRODUCTION

1. The FCC is cracking down on the scourge of illegal robocalls by tackling the problem at every stage of the lifecycle of a call. From blocking to traceback, from call authentication to robocall mitigation, we are making it harder for fraudsters to ring your phone. Today, we go right to the beginning of the process—numbering. While bad actors can initiate an illegal robocall in a variety of ways, it starts with a telephone number. We initiate this proceeding to evaluate whether we should adopt changes to our telephone numbering policies, particularly in how assigned numbers are used by service providers, to further combat illegal robocalls originating from those numbers.

2. Although wireline, wireless, and interconnected VoIP service providers may receive numbering resources directly from the North American Numbering Plan Administrator (NANPA), distribution of numbers is broader because, in some instances, it involves multiple levels of resellers that indirectly access numbering resources. This wide and indirect distribution of numbering resources also partly enables the robocall ecosystem.

3. We explore a broad array of solutions to strengthen our numbering requirements and policies, especially as related to resellers because some of the most extensive illegal robocalling schemes often involve resellers.[1] Specifically, this item considers expanding certain interconnected VoIP direct access certification and disclosure obligations to all service providers accessing numbering resources directly from the NANPA and also to those reselling voice service that includes the provisioning of one or more telephone numbers (the resale of telephone numbers). We also explore implementing enhanced reporting and tracking of the use of numbering resources by resellers of telephone numbers as a way to prevent them from enabling robocalls and from obstructing robocall enforcement. We also propose and seek comment on other changes to our numbering administration policies for all providers that may aid in our efforts to combat robocalls. We propose these actions pursuant to the Commission's broad numbering administration authority under the Communications Act of 1934, as amended (the Act), and in furtherance of our work implementing section 6(a) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.[2]

[1] *See e.g.*, *infra* para. 4 & n.10. In this *Notice*, we will use both the terms "reseller" and "reseller of telephone numbers" interchangeably.

[2] *See* 47 U.S.C. § 251(e); Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, § 6(a)(1)-(2), 133 Stat. 3274, 3282 (2019) (TRACED Act) (codified at 47 U.S.C. § 227b-1(a)).

II. BACKGROUND

A. The Persistent Problem of Robocalls

4. Combatting illegal robocalls remains paramount among the Commission's consumer protection priorities.[3] Because no silver bullet exists to eradicate illegal robocalls, the Commission takes a multi-pronged approach to protecting consumers from such calls, by implementing requirements that attack the problem from all sides. Among its actions is a requirement that providers implement the STIR/SHAKEN caller ID authentication framework in their Internet Protocol (IP) networks.[4] Other requirements concern call blocking,[5] tracebacks,[6] development of robocall mitigation plans and filing in the Commission's Robocall Mitigation Database (RMD),[7] and know-your-customer-style rules.[8] Compliance with Commission requirements to combat robocalls is among the most significant ongoing obligations of voice service providers. When providers fail to meet these requirements, the Commission takes enforcement action to hold them accountable.[9] Specifically with regard to the numbering

[3] FCC, *Stop Unwanted Robocalls and Texts*, https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts (last visited Mar. 2, 2026).

[4] STIR/SHAKEN is a set of technical standards and protocols designed to protect consumers from illegally spoofed robocalls by allowing providers to verify that the caller ID information transmitted with a particular call matches the caller's telephone number. *See Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97, 38 FCC Rcd 2573, 2575, para. 4 n.8 (2023) (*Caller ID Authentication Sixth Report and Order*). STIR/SHAKEN stands for Secure Telephone Identity Revisited, and Signature-based Handling of Asserted information using toKENs. *Id*.

[5] *See e.g.*, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Eighth Report and Order, CG Docket 17-59, 40 FCC Rcd 1902, 1902-03, paras. 1, 5 (2025) (*2025 Call Blocking Order*) (expanding the requirement to block calls based on a reasonable do not originate (DNO) list to include all U.S.-based providers in the call path, and establishing Session Initiation Protocol (SIP) code 603+ as the exclusive code to notify callers when calls on IP networks are blocked based on reasonable analytics).

[6] 47 CFR § 1200(n)(1).

[7] *See e.g.*, *Improving the Effectiveness of the Robocall Mitigation Database*; *Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, WC Docket No. 24-213, MD Docket No. 10-234, Report and Order, 40 FCC Rcd 599, 600-01, paras. 4-5 (2025).

[8] *See*, *e.g.*, 47 CFR § 64.1200(n)(4)-(5). Consumers also have additional robocalling protections, including a private right of action, under the Telephone Consumer Protection Act (TCPA). 47 U.S.C. § 227(b)(3).

[9] *See Caller ID Authentication Sixth Report and Order*, 38 FCC Rcd at 2574, para. 2 n.5. *See also* Robocall Mitigation Database Filers, Order, 40 FCC Rcd 6009 (EB 2025) (removing an additional 1,203 non-compliant voice service providers from the Robocall Mitigation Database); *Telnyx, LLC*, Notice of Apparent Liability for Forfeiture, 40 FCC Rcd 1720 (2025) (proposing fine after finding insufficient know-your-customer practices); *Sumco Panama SA et al.,* Forfeiture Order, 38 FCC Rcd 7235 (2023) (*Sumco Panama Forfeiture Order*) (levying a historic fine of almost $300 million against a variety of entities that placed over five billion illegal auto warranty robocalls to consumers between January 2021 and March 2021); *One Eye LLC*, Final Determination Order, 38 FCC Rcd 4211 (EB 2023) (prohibiting voice service providers from accepting call traffic from One Eye LLC); *Urth Access, LLC*, Order, 37 FCC Rcd 14133 (EB 2022) (directing all U.S.-based voice service providers to take immediate steps to mitigate suspected illegal student loan-related scam robocall traffic from Urth Access and other specified entities). The Commission has also entered into Memoranda of Understanding with all 50 state jurisdictions, the District of Columbia, and Guam to establish critical information sharing and cooperation regarding robocalls. *See* FCC, *State Robocall Investigation Partnerships*, https://www.fcc.gov/fcc-state-robocall-investigation-partnerships (last updated Mar. 11, 2024).

requirements we address today, the FCC Enforcement Bureau has found that the majority of its robocall investigations have involved resold numbers.[10]

5. At the same time, significant technological achievements are paving the way to a substantial transition to IP networks, consumer-friendly next generation communications services, and a vibrant competitive marketplace in the world of telecommunications. These advances have undoubtedly benefitted American consumers by making next generation services better, cheaper, and more ubiquitous. Associated with these changes is the proliferation of various voice service providers—including interconnected VoIP providers, local exchange carriers (LECs), commercial mobile radio service (CMRS) providers, and wholesale providers—within the modern call path. However, this has not been without downsides, as bad actors can deliver illegal and fraudulent calls using these new technologies. While the Commission has diligently worked to encourage innovation and technology transition in the voice marketplace, it has simultaneously strived to protect consumers from these bad effects.

6. The transition to IP-based calling, while a net positive, has also reduced the Commission's visibility into how the myriad entities comprising the modern call path access, hold, and utilize their numbering resources, compared to the telephone system of decades ago. Resellers of telephone numbers, which under our current rules are less accountable for how they utilize those numbers, play a significant role—intentionally or not—in obscuring business relationships with robocallers by adding multiple layers into the assignment and use of numbers. This can hinder enforcement investigations by making the actual use of numbers less visible and traceable in current numbering utilization reporting practices.[11] State regulatory commissions have expressed significant frustration with lack of available numbering reporting information both as a general matter, and specifically as it relates to resellers of telephone numbers.[12] This lack of visibility has made bad actors more difficult to identify, leaving consumers more vulnerable to illegal robocalls.[13]

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[10] *See, e.g.*, *Sumco Panama Forfeiture Order*, 38 FCC Rcd at 7250, para. 35 (describing how an auto warranty robocall operation used resellers to obtain over a million numbers); *John C. Spiller et al.*, Memorandum Opinion and Order, 38 FCC Rcd 5581, 5584, para. 6 n.20 (2023) (*Spiller Reconsideration Order*) (citing evidence showing multiple levels of resale). *See also* National Association of Regulatory Utility Commissions, *Perspectives and Recommendations on How Telephone Number Conservation Can be Enhanced to Extend the Life of the North American Number Plan (NANP) and Reduce Illegal Robocalling Activity* at 12 (adopted Feb. 11, 2026) https://pubs.naruc.org/pub/0CFAB9E5-CC00-D558-D278-2CBA85370EB1 (NARUC White Paper) ("Through extensive research, State Commissions have linked illegal robocalls to SPs that are actively utilizing the wholesale market").

[11] *See*, *e.g.*, North American Number Council (NANC) Numbering Administration Oversight Working Group (NAOWG) Direct Access Report, at 14 (Dec. 13, 2024), https://www.fcc.gov/files/naowg-direct-access-report-12-13-24 (NANC NAOWG Report) (noting that "[t]he Commission has limited resources that contain information about the wholesale of numbers that their customers resell", that "[t]his limited visibility can be problematic" and that "the use of large volumes of numbers disposably has also been linked to illegal robocall campaigns"); Maine Public Utilities Commission Staff Reply Comments, CG Docket No. 17-59 et al., at 6 (filed Feb. 2, 2026) (Maine Staff February 2026 Reply) (with respect to lack of information in the multi-layer wholesale market).

[12] *See*, *e.g.*, Maine Staff February 2026 Reply at 2-3; California Public Utility Commission, the Maine Public Utility Commission, and the Public Service Commission of the District of Columbia Comments, OMB Control No. 3060-0895, at 1-5 (State NRUF PRA Comments) (noting that inconsistent number utilization reporting practices among carriers receiving numbering resources makes it difficult to determine which service provider is actually using the number and proposing several recommendations to increase visibility into who the identity of the actual number holder) (rec. Apr. 4, 2025), https://www.reginfo.gov/public/do/DownloadDocument?objectID=156984402.

[13] *See* NANC NAOWG Report at 15 (with respect to value of visibility into wholesale market number utilization). Indeed, the Maine Public Utilities Commission staff have indicated that even some wholesale providers claim not to have "clear visibility into what happens to all of the numbers from their blocks due to the multi-layer wholesale market." Maine Staff February 2026 Reply at 6.

B. Numbering Administration Policy

7. The telephone numbers that have enabled communications for decades are a limited public resource—not the property of the voice service providers who hold them or their customers.[14] Congress vested exclusive jurisdiction in the Commission in section 251(e)(1) of the Act to regulate and administer numbering resources in the United States.[15] U.S. numbering resources are part of the North American Numbering Plan (NANP)—the basic numbering scheme for 20 countries in North America—covering the United States including its territories, Canada, Bermuda and much of the Caribbean. Section 251(e)(1) requires the Commission to administer numbering resources on an equitable basis.[16] The Commission has long held two principal objectives in fulfilling this statutory mandate. The first is to ensure that the NANP's limited numbering resources are used efficiently by protecting customers from the expense and inconvenience that results from the implementation of new area codes,[17] and by forestalling exhaust of the finite universe of numbers in the NANP and the resultant enormous expense that would be incurred in expanding NANP capacity.[18] The second is to ensure that all service providers have the numbering resources they need to compete in the telecommunications marketplace.[19]

8. The Commission performs the primary role in NANP numbering administration, and delegates numbering administration duties to the NANPA, which is a neutral company that operates under a competitively bid contract with the Commission.[20] In addition to its role administering area codes for 20 NANP member countries, the NANPA administers numbering resources within the United States, with involvement of state regulatory commissions and other entities, subject to Commission oversight.[21] The NANPA's role in managing the nation's numbering resources includes the assignment of area codes and the numbering resources within area codes, such as central office (CO) codes,[22] and thousand-number blocks, as well as numbering resources used for other purposes in accordance with Commission rules, orders, and applicable industry guidelines.[23] NANPA responsibilities for the day-to-day administration of

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[14] *Administration of the North American Numbering Plan*, CC Docket No. 92-237, Report and Order, 11 FCC Rcd 2588, 2591, para. 4 (1995).

[15] 47 U.S.C. § 251(e)(1).

[16] *Id*.

[17] Area codes are also referred to more formally as Numbering Plan Areas.

[18] *Numbering Resource Optimization*, CC Docket 99-200, Report and Order, 15 FCC Rcd 7574, 7577, para. 1 (2000) (*Numbering Resource Optimization First Report and Order*).

[19] *Id.* at 7577, para. 1.

[20] *Id.* at 7639-40, para 148 (concluding that seeking competitive bids for thousands-block number pooling administration, as the Commission has done for NANP administration, "furthers the competitive framework that Congress established in implementing the 1996 Act and is consistent with federal procurement law"); 47 CFR § 52.12.

[21] *See* 47 U.S.C. § 251(e)(1); 47 CFR §§ 52.3, 52.12, 52.15.

[22] The term "central office code" refers to the fourth through sixth digits in a ten-digit telephone number. Central office codes are also sometimes called "NXX codes"—in the telephone number 202-418-XXXX, 418 is the central office code.

[23] *See* 47 CFR §§ 52.13; 52.20. The thousands-block number pooling administrator role has been consolidated in the NANPA since 2020. *See* Press Release, FCC, FCC Selects SomosGov as Next Telephone Number Administrator and Reassigned Numbers Database Administrator (Dec. 21, 2020), https://docs.fcc.gov/public/attachments/DOC-368493A1.pdf. Industry guidelines pertaining to numbering administration and numbering resource usage are referenced in our numbering rules. *See* 47 CFR §§ 52.12(c), 52.13(b), (b)(3)-(4), (b)(11)-(12), (b)(15), (c)(8), (d), 52.15(d), (g)(3)(ii)(B), (g)(3)(x)(B), (k)(1), (k)(3), 52.19(b). These guidelines were developed and are continually reviewed, updated and modified by various industry groups,

(continued….)

U.S. numbering resources include processing applications from service providers for numbering assignments, generating timely numbering utilization and exhaust forecasts, and reporting numbering status to the Commission and state commissions.[24]

9. *Current Requirements for Direct Access to Numbers*. Service providers have significant responsibilities regarding numbering resources provided to them. Service providers seeking numbering resources must demonstrate to the NANPA that they are authorized to provide service in the area for which the numbering resources are requested, which the Commission has interpreted to mean they must hold a state certificate of public convenience and necessity (CPCN) or an appropriate Commission license.[25] Service providers are also required to prove that they are capable of placing newly assigned numbering resources into service within 60 days of assignment (preventing numbering resources from lying fallow),[26] manage the utilization of the numbering resources allocated to them in compliance with rules, policies, and guidelines, and file numbering resource utilization/forecast (NRUF) reports on a regular basis to enable the NANPA, the Commission, state regulators, and industry to monitor numbering utilization and exhaust. The Commission's numbering utilization reporting requirements primarily serve number conservation and inventory management objectives, distinct from caller ID authentication and robocall mitigation obligations imposed under Part 64 of the Commission's rules. However, the use and misuse of numbering resources can be an element of both the challenges and solutions to caller ID authentication and robocall mitigation. A provider's failure to manage numbering resources responsibly may inform the Commission's assessment of whether continued access to those numbering resources would serve the public interest.[27]

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including the Industry Numbering Committee (INC) within the Alliance for Telecommunications Industry Solutions (ATIS). *See*, *e.g.*, ATIS, Industry Numbering Committee, North American Numbering Plan Numbering Resource Utilization/Forecast (NRUF) Reporting Guidelines, ATIS 0300068, § 6.2 (Oct. 28, 2024) (INC NRUF Guidelines), https://access.atis.org/higherlogic/ws/public/document?document_id=81667. *See also* 47 CFR §§ 52.13(b)(3)-(4), (b)(7), (c)(8), (d) (referencing the INC). Our numbering rules require that the NANPA and the NANP Fund Billing and Collection Agent (B&C Agent) monitor any changes to relevant industry guidelines. *Id.* § 52.12(c). *See also id.* §§ 52.13(b)(7) (NANPA "[c]ooperating with and actively participating in numbering standards bodies and industry fora, such as INC"). Each must "assesses the impact on its operations and advise the Commission of any changes required" to accommodate the changes in guidelines, as well as "provide written explanation why such changes are required." *Id.* § 52.12(c). As the government agency that procures the NANPA contract and the contract for B&C Agent services, the Commission determines whether and to what extent any proposed changes to guidelines are to be implemented by the NANPA and/or B&C Agent, and whether to adopt proposed changes, if any are necessary, to the scope and cost of the contract for NANPA or B&C Agent services or both.

[24] *See* 47 CFR §§ 52.13, 52.15. Among its responsibilities, the NANPA reviews numbering resource requests to determine whether an applicant is eligible, whether numbering resources are available in the requested area code and rate center, and whether the request complies with applicable numbering access, usage, and conservation rules and guidelines. *See e.g.*, *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7580-81, para 7.

[25] *Id.* § 52.15(g)(2); *Numbering Policies for Modern Communications et al.*, WC Docket No. 13-97 et al., Report and Order, 30 FCC Rcd 6839, 6841, para. 4 (*First VoIP Direct Access Report and Order*). Holders of Commission licenses for wireless voice and paging services may obtain numbering resources.

[26] 47 CFR § 52.15(f)(4)-(6) (NRUF reporting); *id.* § 52.15(g)(2) (stating that "[a]n applicant for initial numbering resources must include in its application evidence that the applicant is authorized to provide service in the area for which the numbering resources are requested; and that the applicant is or will be capable of providing service within sixty (60) days of the numbering resources activation date").

[27] Holders of Commission authorizations, including interconnected VoIP numbering authorizations, have a "clear and demonstrable duty to operate in the public interest." *See Numbering Policies for Modern Communications et al.*, WC Docket No. 13-97 et al., Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 8951, 8985, para. 66 (2023) (*Second VoIP Direct Access Report and Order and Further Notice*); *see also Caller ID Authentication Sixth Report and Order*, 38 FCC Rcd at 2609, para. 70.

10. Commission numbering administration policy has also included expanding the universe of service providers eligible to obtain numbering resources. In 2015, recognizing the need to support the transition to Internet Protocol (IP)-based voice networks, the Commission considered whether interconnected VoIP providers, which in many states may not be eligible to obtain CPCNs from state commissions, should be able to obtain their own direct access to numbering resources from the NANPA.[28] With the exception of limited trials, prior to the 2015 *First VoIP Direct Access Report and Order* interconnected VoIP providers had to obtain numbering resources indirectly through telecommunications carrier partners (incumbent and competitive LECs), rather than directly from the NANPA.[29] This indirect arrangement obscured visibility into interconnected VoIP number utilization, sheltering them from the transparency and public interest scrutiny received by their carrier counterparts.[30] In the *First VoIP Direct Access Report and Order*, the Commission adopted rules permitting interconnected VoIP providers, upon Commission authorization, to obtain numbering resources directly without a CPCN, subject to compliance with utilization, reporting, and conservation requirements codified in Part 52 of the Commission's rules.[31]

11. In the years since the *First VoIP Direct Access Report and Order*, the Commission's numbering-related robocall efforts have focused on interconnected VoIP providers and their direct access to numbering resources. As part of implementing the TRACED Act in 2021, the Commission recognized the nexus between the proliferation of interconnected VoIP providers and robocalling. In the context of direct access in the *First VoIP Direct Access Further Notice*, we acknowledged that "[t]he rising tide of robocalls and the emergence of VoIP go hand in hand."[32] In view of this, the Commission proposed that all interconnected VoIP applicants for direct access to numbering resources be required to make robocalling certifications as part of their application.[33]

12. The Commission updated the requirements for interconnected VoIP numbering authorization applicants in the 2023 *Second VoIP Direct Access Report and Order*.[34] Specifically, the Commission updated the interconnected VoIP numbering authorization process to require certifications

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[28] *See First VoIP Direct Access Report and Order*, 30 FCC Rcd at 6844, para. 13 (stating, "[o]ur pro-consumer, pro-competitive actions today are consistent with the Commission's goal to facilitate the transition to all-IP networking and promote interconnection of IP-based voice networks, and serve as an integral, incremental step in furthering the Nation's technology transition.") (internal citations omitted).

[29] *See Numbering Policies for Modern Communications et al.*, WC Docket No. 13-97 et al., Further Notice of Proposed Rulemaking, 36 FCC Rcd 12907, 12908, para. 3 (2021) (*First VoIP Direct Access FNRPM*). ("The Commission first began to allow interconnected VoIP providers to obtain numbers for customers directly from the Numbering Administrator—rather than relying on a carrier partner—in 2015.").

[30] *First VoIP Direct Access Report and Order*, 30 FCC Rcd at 6841, para. 2 (recognizing that "permitting interconnected VoIP providers to obtain telephone numbers directly from the Numbering Administrators will . . . increase visibility and accuracy of number utilization, enabling the Commission to more effectively protect the Nation's finite numbering resources").

[31] *Id.* at 6848, paras. 20-21 (At the time, in addition to the NANPA, there was a separate thousands-block number pooling administrator. These two administrator roles have now been consolidated in the NANPA. *See supra* n.23.) Once an interconnected VoIP provider has Commission authorization to obtain numbering resources, it may request numbers directly from the numbering administrator. *First VoIP Direct Access Report and Order*, 30 FCC Rcd at 6849, para. 22 n.70; 47 CFR § 52.15(g)(3).

[32] *See First VoIP Direct Access FNPRM*, 36 FCC Rcd at 12908, para. 2.

[33] *See id.* at 12913-15, paras. 12-15. The Commission sought comment on how to improve the interconnected VoIP direct access application process to address identified gaps in the direct access application process, illegal robocalling, national security, and number resource exhaust. *Id.* at 12913, para. 11.

[34] *Second VoIP Direct Access Report and Order and Further Notice*.

related to robocall mitigation, public safety, national security, other Commission rules, and state laws, as well as ownership and control information disclosures. These changes provided needed visibility into the identities of interconnected VoIP provider applicants and enhanced the Commission's enforcement mechanisms against potential bad actors.[35] Two of the certification requirements codified in section 52.15(g)(3)(ii) of our rules are uniquely relevant to the Commission's efforts to combat illegal robocalling:

> (C) A certification that the applicant will not use the numbers obtained pursuant to an authorization under this paragraph (g)(3) to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 through 64.6308 of this chapter and 16 CFR 310.3(b); and
>
> (D) A certification that the applicant has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 through 64.6305 of this chapter.[36]

13. The rule changes adopted in the 2023 *Second VoIP Direct Access Report and Order* applied only to new applicants for interconnected VoIP provider direct access—in particular, the amendments to the certification and disclosure requirements in section 52.15(g)(3)(ii), including subparagraphs (C) and (D) quoted above, applied only to those providers submitting applications for direct access on or after the effective date of those requirements (August 8, 2024).[37] In December 2025, the Commission adopted the *Third VoIP Direct Access Report and Order*, expanding applicability of the new certification and disclosure requirements from the *Second VoIP Direct Access Report and Order* to *all* interconnected VoIP direct access authorization holders.[38] Existing authorization holders are now required to file updated robocall-related certifications, ownership and control disclosure information, as well as updated certifications and disclosures.[39] Only interconnected VoIP providers seeking direct access authorizations are required to make these certifications to the Commission, versus all of the other voice service providers in the industry. As such, the requirement to certify to robocall and other obligations are applicable only to a very narrow subset of service providers.[40]

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[35] *Id.*, 38 FCC Rcd at 8958-77, para. 12-50.

[36] 47 CFR § 52.15(g)(3)(ii)(C)-(D).

[37] *See* Federal Communications Commission, Numbering Policies for Modern Communications, Final rule and announcement of effective date, 89 Fed. Reg. 64832 (Aug. 8, 2024). Other rule amendments adopted in the *Second VoIP Direct Access Report and Order* took effect on December 20, 2023. *See* Federal Communications Commission, Numbering Policies for Modern Communications, Final rule, 88 Fed. Reg. 80617 (Nov. 20, 2023).

[38] *Numbering Policies for Modern Communications et al.*, WC Docket No. 13-97 et al., Third Report and Order and Third Further Notice of Proposed Rulemaking, FCC 25-86 at 6, para. 10 (rel. Dec. 19, 2025) (*Third VoIP Direct Access Report and Order*) (specifically, the Commission adopted rules that would require all existing direct access authorization holders to comply with the updated requirements within 30 days of becoming effective.).

[39] *Id.* at 3, para. 3. The effective date of the rules adopted in the *Third VoIP Direct Access Report and Order* are deferred until the associated information collection receives Office of Management and Budget approval under the Paperwork Reduction Act and the Wireline Competition Bureau announces the effective date in the Federal Register. *See id.* at 19, para. 45.

[40] While interconnected VoIP providers may have economic and other incentives to seek authorization to obtain direct access to numbers, only 133 interconnected VoIP providers had sought and received such authorizations as of the date of the Commission's 2025 *Third VoIP Direct Access Report and Order*. FCC, VoIP Numbering Authorization Grants, https://www.fcc.gov/wireline-competition/voip-numbering-authorization-grants (last visited

(continued….)

III. EXPANDING CERTIFICATION AND DISCLOSURE REQUIREMENTS BEYOND SERVICE PROVIDERS WITH DIRECT ACCESS AUTHORIZATIONS

14. In the *Third VoIP Direct Access Report and Order*, we observed that previously adopted certification and information disclosures for interconnected VoIP direct access applicants (of which the robocall certifications are part) "have provided much needed transparency and enhanced the Commission's enforcement mechanisms against potential bad actors seeking to exploit numbering resources and the authorization process."[41] We reasoned that extending these obligations to preexisting direct access authorization holders and then-pending applicants "ensure[s] that our ongoing actions targeting illegal robocalling and spoofing, as well as safeguards for national security and public safety, have a greater impact and are consistently applied."[42]

15. For the same reasons, we now propose to further extend the robocall certification requirements to *all* service providers that receive numbering resources directly from the NANPA, not just interconnected VoIP providers, and also to resellers of telephone numbers. These certification requirements should apply uniformly and not just to interconnected VoIP providers with direct access authorizations, just as many of our robocall rules themselves apply equally to all voice service providers.[43] Further, given the role that at least some resellers of telephone numbers have played in enabling robocalling,[44] it is likely necessary to apply the certification requirements to resellers as well, thereby closing a transparency gap in the numbering ecosystem.

16. We propose to level the regulatory playing field so that all entities obtaining numbering resources directly from the NANPA, and resellers of telephone numbers, must abide by certain certifications currently required of interconnected VoIP direct access applicants. We propose to define resellers of telephone numbers as all LECs, CMRS providers, and interconnected VoIP providers reselling or seeking to resell services that include the provisioning of geographic numbering resources other than pseudo ANI.[45] We propose to exclude providers of Video Relay Service (VRS) and Internet Protocol Relay Service (IP Relay)—two forms of Telecommunications Relay Services (TRS), that receive numbering resources indirectly—to the extent that any such TRS providers could be considered LECs or

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Mar. 2, 2026); FCC, EDOCS, https://www.fcc.gov/edocs (last visited Mar. 2, 2026). In contrast, over 1,860 interconnected VoIP providers in the United States report subscribers to the Commission. FCC, Office of Economics and Analytics, Voice Telephone Services: Status as of December 31, 2024, at 10, Tbl. 2 (2026) (December 2024 Voice Telephone Services Report), https://docs.fcc.gov/public/attachments/DOC-418460A1.pdf.

[41] *Third VoIP Direct Access Report and Order*, FCC 25-86 at 2, para. 2.

[42] *Id.* at 3, para. 3.

[43] *See, e.g.*, 47 CFR §§ 64.6301 (requiring voice service providers to implement STIR/SHAKEN); 64.6305 (establishing Robocall Mitigation Database requirements for voice service providers); 64.6300(o) (defining voice service broadly for purposes of the STIR/SHAKEN and Robocall Mitigation Database rules); 64.1200(n) (requiring voice service providers to participate in traceback requests); 64.1200(o) (requiring voice service providers to block certain calls); 64.1600(r) (defining voice service broadly, as used for the traceback and call blocking rules).

[44] *See supra* para. 4 & n.10.

[45] Our proposed rule uses the shorter term "reseller" rather than "reseller of telephone numbers," although both reflect this definition in the proposed rule. *See* Appendix A, proposed revisions to 47 CFR § 52.15(f)(1)(v). A Pseudo Automatic Number Identification (Pseudo-ANI or p-ANI) is a "number, consisting of the same number of digits as ANI, that is not a North American Numbering Plan telephone directory number and may be used in place of an ANI to convey special meaning. The special meaning assigned to the pseudo-ANI is determined by agreements, as necessary, between the system originating the call, intermediate systems handling and routing the call, and the destination system." *Id.* § 9.3. ANI, in turn, "refers to the delivery of the calling party's billing number by a local exchange carrier to any interconnecting carrier for billing or routing purposes, and to the subsequent delivery of such number to end users." *Id.* § 64.1600(b).

interconnected VoIP providers.[46] Use of numbering resources for TRS purposes are closely overseen, with numbers assigned to registered users in the United States, whose identities are verified.[47] The numbers must be entered into the TRS Numbering Directory,[48] and payments to TRS providers are conditional on providers reporting the use of those numbering resources for review by the TRS Fund administrator.[49]

17. Specifically, we propose to extend the robocall-related certification obligations in section 52.15(g)(3)(ii)(C) and (D),[50] to all service providers directly receiving numbering resources from the NANPA, as well as to resellers of telephone numbers, as a one-time obligation, regardless of the means by which they deliver service or the underlying regulatory regime in which they may be authorized to provide service.[51] Current service providers receiving numbering resources directly from the NANPA, and resellers of telephone numbers operating as of the effective date of any requirement we propose to adopt in this regard, would be required to file these certifications within 30 days of the effective date of the new rule. Service providers intending to obtain numbering resources for the first time from the NANPA, as well as resellers of telephone numbers intending to become operational, would be required to file certifications at least 30 days prior to submitting their first request for numbering resources to the NANPA or to beginning to resell service, respectively. We propose to apply these requirements on the basis of individual Operating Company Numbers (OCNs)[52] for service providers obtaining numbering resources from the NANPA and on the basis of FCC Form 499 Filer IDs[53] for resellers of telephone numbers. Certifications would be filed in a newly-created intake docket in the Commission's Electronic Comment Filing System (ECFS) similar to that used for the certifications required by the *Direct Access Third Report and Order*.[54] Service providers would also have to submit copies of their certification

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[46] TRS are not within a specific category of defined communications services, rather they are referred to as telephone transmission services, and defined by function. 47 U.S.C. § 225(a)(3).

[47] 47 CFR § 64.611(a).

[48] *Id.* § 64.613

[49] *Id.* § 64.604(c)(5)(iii)(D)(*2*).

[50] *Id.* § 52.15(g)(ii)(C), (D).

[51] By definition, this would, among others, include service providers that have received waivers of the requirement in section 52.15(g)(2) that an applicant for numbering resources is authorized to provide service in the area for which the numbering resources are requested. *Id.* § 52.15(g)(2). *See*, *e.g.*, *Numbering Policies for Modern Communications; Numbering Resource Optimization*, WC Docket Nos. 13-97, 99-200, Order, 33 FCC Rcd 12501 (2018) (granting waiver to Altice USA, Inc. to permit it to obtain numbering resources for an "infrastructure-based Mobile Virtual Network Operator" service).

[52] An Operating Company Number (OCN) is a four-character code used to identify telecommunications service providers and is the basis on which numbering resources are assigned. *See* ATIS, Industry Numbering Committee, Thousands-Block and Central Office Code Administration Guidelines(2025-09), (INC TBACOCAG Guidelines), ATIS 0300119, at 177 (Sept. 26, 2025), https://access.atis.org/higherlogic/ws/public/document?document_id=84025. The National Exchange Carrier Association assigns all OCNs. OCNs are the organizational unit to which numbering resources are associated in the NANPA's numbering administration system, and with which compliance with recurring numbering obligations, such as filing NRUF forms, is measured. 47 CFR § 52.15(g)(1) (OCN and parent company OCN required in applications), (g)(4)(iv)-(v) ("the NANPA shall not issue numbering resources to a carrier without an OCN"); *id.* § 52.15(f)(3) (NRUF reporting must include OCN and parent company OCN).

[53] FCC Form 499 Filer IDs are obtained from the Universal Service Administrative Company (USAC) via a registration process. *See* USAC, Register for a 499 ID, https://www.usac.org/service-providers/contributing-to-the-usf/register-for-a-499-id/ (last visited Mar. 2, 2026).

[54] *See Third VoIP Direct Access Report and Order*, FCC 25-86, at 6-7, para. 11.

filings to the NANPA along with already-required qualification information, such as proof of authorization, when requesting initial numbering resources.[55]

18. We seek comment on this proposal. Do commenters agree that robocall certification obligations should be extended as we propose? Is the proposed scope of service providers potentially subject to these obligations appropriate? Specifically with respect to TRS providers, is it necessary to require the direct access robocall certifications? Is there a better approach concerning these providers and robocall-related certification requirements? More generally, is there any reason to distinguish robocall certification obligations between different types of service providers?[56] Should the new certification obligations only be one-time and filed by the method proposed? Would the certification process be overly burdensome? If commenters believe so, they should state with specificity why, and provide cost and time estimates. We also seek comment on our definition of reseller of telephone numbers. Is it sufficiently broad, or perhaps overly broad? Is there greater clarity that we should provide regarding when an entity is an end user and when it is not? In commenting on the definition of reseller of telephone numbers and as a general matter, we request that commenters provide whatever information they deem useful in describing the mechanics of how numbering resale works. In addition, we seek comment on whether wholesale providers should be responsible for ensuring that resellers of their telephone numbers have submitted certifications and whether the failure of any of their resellers to do so should be grounds for suspension of a wholesale provider's right to obtain further numbering resources.[57]

19. We acknowledge that section 52.15(g)(3)(ii) of our rules requires interconnected VoIP applicants for direct access authorizations to certify compliance with obligations and information disclosure requirements that are unrelated to robocalls. These are not included in our proposal, with two exceptions—a foreign ownership certification and a general procedural requirement addressing truthful certifications as described below. Those other certifications required of interconnected VoIP providers that we omit from our proposal largely fill potential compliance gaps unique to the regulatory status of interconnected VoIP providers, and do not seem relevant to LECs, CMRS providers, and resellers of telephone numbers.

20. At the same time, we are also mindful of the risks of foreign adversaries engaging in widespread and coordinated efforts to exploit, attack, and otherwise compromise the integrity of U.S. communications networks—risks that the Commission has been working diligently to address.[58] Because of the importance of our foreign ownership rules and their evolving nature, including as safeguards against illegal robocalls, we propose to require all service providers that receive numbering resources directly from the NANPA, as well as resellers of telephone numbers, to certify compliance with our foreign ownership reporting rules as applicable, specifically sections 1.80003(a), (j), and (l), 22.5,

[55] *See* Appendix A, proposed revisions to 47 CFR § 52.15(g)(2) (requirements for applications for initial numbering resources).

[56] Specifically with respect to resellers of telephone numbers, state commissions have observed a pattern of holders of Commission-issued interconnected VoIP direct authorizations losing their access to new numbering resources by failing to comply with state law, and then nonetheless continuing to obtain numbering resources indirectly through wholesale providers. NARUC White Paper at 11. If accurate, this would seem to indicate potential use of the wholesale market to circumvent legal and regulatory compliance obligations. As such, this suggests the need to extend certain compliance obligations to resellers of telephone numbers.

[57] Such resellers could be identified on the wholesale provider's NRUF form. *See infra* Section IV.A.

[58] *See*, *e.g.*, *Protecting Our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, GN Docket No. 25-166, Report and Order, FCC 26-2 (2026).

24.404(b), 63.18(h) and (i), and 90.115.[59] Under this proposal, these new obligations would also apply to current and future holders of Commission interconnected VoIP direct access authorizations. Holders of such authorizations as of the effective date of any foreign ownership certification requirement would have 30 days to comply.

21. Do commenters agree that we should omit the other non-robocall-related obligations and information disclosure requirements in section 52.15(g)(3)(ii) from those which we would be requiring on an expanded basis? If not, which certifications do commenters suggest we include and why? For example, do commenters believe that we should include 52.15(g)(3)(ii)(I) (relating to filing FCC Forms 477 and 499) or 52.15(g)(3)(ii)(J) (relating to Universal Service Fund, Telecommunications Relay Service and NANP and local number portability administration contribution obligations)?[60] Do commenters support adding a certification regarding foreign ownership in addition to those already required? If not, why not? Should the list of rules referenced in the proposed certification be expanded or contracted?

22. Finally, if we adopt any new certification obligations, we propose that they also include the declaration required in section 52.15(g)(3)(ii)(N), that, as pertinent here, the certifications are true "under penalty of perjury pursuant to § 1.16" of the Commission's rules.[61] We seek comment on this proposal.

23. Do commenters agree with our proposed method of implementation? Specifically, is 30 days sufficient time to comply with these new obligations for current providers of record of numbering resources? For service providers that would obtain numbering resources for the first time, or resellers of telephone numbers initiating their businesses, is providing the certification at least 30 days prior to requesting numbering resources overly burdensome? We invite commenters to propose alternatives. In addition, we seek comment on whether we should establish a later implementation deadline for current providers of record that are small entities and, if so, what it should be and how we should define small entities for such purposes.

IV. PREVENTING RESALE PRACTICES FROM OBSTRUCTING ROBOCALL ENFORCEMENT

A. Enhancing Wholesale Reporting Requirements

24. In this section, we seek comment on new tools for the Commission, state regulators, and the NANPA to better track numbering resource utilization, enhancing the ability to measure numbering resource exhaust, and misuse, including robocalls. In particular, we seek comment on modifying the existing NRUF report form (FCC Form 502) reporting requirements to better support mitigation and enforcement efforts against illegal robocalls, as well as to inform numbering administration and policy development.

25. *Current NRUF Reporting Obligations.* The NANPA, Commission, and state regulators use NRUF reports to track and analyze numbering resource utilization and exhaust for purposes of area code and other planning, and are increasingly using that data to target numbering resource misuse including robocall campaigns.[62] The North American Numbering Council (NANC) accurately observed

[59] 47 CFR §§ 1.80003(a), (j), (l) (domestic section 214, international section 214, interconnected VoIP, and CMRS foreign adversary reporting requirements), 22.5 (CMRS ownership reporting), 24.404(b) (CMRS ownership reporting), 63.18(h), (i) (international section 214 ownership reporting), and 90.115 (CMRS ownership reporting).

[60] *Id.* § 52.15(g)(3)(ii)(I), (J).

[61] *Id.* § 52.15(g)(3)(ii)(N).

[62] *See* NANC, Call Authentication Trust Anchor (CATA) Working Group, Report on Direct Access to Numbers by Interconnected Voice Over Internet Protocol (VoIP) Providers at 23 (Dec. 13, 2024), (NANC CATA Report), https://www.fcc.gov/sites/default/files/12-13-24-CATA-Direct-Access-Report.pdf (noting that NRUF reports,

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that "[t]his reporting enables NANPA and regulators to maintain accurate records of number utilization and anticipate future needs, while assessing trends, therefore ensuring that numbering resources are efficiently allocated and preventing the exhaustion of available numbers."[63]

26. The Commission's numbering rules require telecommunications carriers, which includes interconnected VoIP providers for purposes of Part 52 of the Commission's rules, to submit numbering resource utilization and forecast data to the NANPA twice per year.[64] Those reporting must do this by submitting a completed NRUF form.[65] For each block of numbers obtained, the reporting provider[66] must submit utilization data in five mutually exclusive categories: *administrative*, *aging*, *assigned*, *intermediate*, and *reserved*.[67] *Intermediate numbers* are most relevant to this proceeding because they relate to reselling relationships and potentially can provide information about the chain of custody of specific numbers and overall usage patterns. Under our current rules, *intermediate numbers* are defined as "numbers that are made available for use by another telecommunications carrier or non-carrier entity for the purpose of providing telecommunications service to an end user or customer."[68] This is in contrast

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particularly intermediate provider reports, can "provide information to help identify bad actors."); NANC NAOWG Report at 14 (access to number allocation and utilization information "may facilitate enforcement against bad actors who misuse numbering resources to fuel illegal robocall campaigns, as well as facilitate preventative actions too.").

[63] NANC NAOWG Report at 11.

[64] 47 CFR §§ 52.15(f)(6), 52.15(f)(2), 52.5(i). While there appears to be uncertainty within the industry about whether interconnected VoIP providers receiving numbers from other interconnected VoIP providers are also subject to this requirement, we note that the terms "telecommunications carrier" and "carrier" are defined for purposes of the entirety of our numbering rules to include interconnected VoIP service providers, and "telecommunications service" is defined to include interconnected VoIP service. 47 CFR § 52.5(i-j). *See, e.g.*, NumberBarn Reply, WC Docket No. 19-9, at 19-21 (filed Dec. 6, 2024) (arguing that the *First VoIP Direct Access Report and Order* only required interconnected VoIP providers to file NRUF forms if they were the direct recipient of the numbering resources); NANC CATA Report at 14 ("Lack of reporting may be due to service providers that either are not educated on properly reporting NRUF data or believe the existing rules around the intermediate category and subsequent additional reporting from the U3 category [in FCC Form 502] do not apply to them."); NANC NAOWG Report at 17 ("there are perceived differences in reporting obligations that depend upon the extent to which services are provided").

[65] *See* 47 CFR § 52.15(f)(5), (7); *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7607, para. 78 (regarding confidentiality).

[66] When a provider obtains numbering resources from the NANPA, it becomes the holder of record of those resources in the NANPA's numbering administration system. This provider remains the holder of record, except when the provider applies to the NANPA to transfer a numbering block to another provider. After the NANPA effects such transfer, the transferee provider becomes the holder of record, and the transferor no longer has any association with (and no reporting responsibility for) such block. We refer below to the provider that is the holder of record as the "provider of record."

[67] 47 CFR § 52.15(f)(5)(i). The categories are defined in our rules at 47 CFR § 52.15(f)(1). We note that section § 52.15(f)(1) states that numbers must be *classified* into one of six categories, while § 52.15(f)(5) describes *reporting* among five categories. This is because the *available* category is a residual category of numbers that are not *administrative*, *aging*, *assigned*, *reserved*, or *intermediate*. *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7592, para. 35. In adopting these definitions, the Commission delegated to the Common Carrier Bureau (now the Wireline Competition Bureau), in consultation with the Wireless Telecommunications Bureau, the responsibility to keep the definitions of the six major or primary categories current in light of technological changes and concerns of the state commissions and industry members. *Id.* at 7585, para. 15.

[68] 47 CFR § 52.15(f)(1)(v). Numbers ported for the purpose of transferring an established customer's service to another service provider are not classified as *intermediate numbers*, but, rather are *assigned numbers*. *See id.* § 52.15(f)(1)(v); *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7585-86, para. 18.

(continued….)

to *assigned numbers*, which are numbers that "ha[ve] been assigned to a specific end-user or customer."[69] The Commission has made clear that, at least until the pertinent number has been assigned to an end user or is ported, "numbers provided to carriers, interconnected VoIP providers, or other non-carrier entities by numbering partners should be reported as 'intermediate,' and do not qualify as 'end users' or 'customers.'"[70]

27. Under our rules, during the period in which a number is reported as *intermediate* by the provider of record, the receiving party, if it is itself a reporting provider, is required to report the number on its NRUF form, categorizing such number in the same manner as with any other numbers in its inventory.[71] Thus, a reporting provider that is receiving the *intermediate number* would report the number according to how it is utilizing it, in one of the five categories depending on the circumstances—*administrative*, *aging*, *assigned*, *reserved*, or *intermediate*.[72] On the other hand, *intermediate numbers* received by an entity that is not a reporting provider need only be reported by the reporting provider providing those numbers to such entity (reporting them as *intermediate numbers*).

28. Industry guidelines detail additional information that reporting providers must include when reporting *intermediate numbers*, stating that the reporting provider "shall provide the name and contact information to the NANPA of the telecommunications carriers that have received the Intermediate numbers."[73] Specifically, the NRUF form instructions state that a provider reporting provision of *intermediate numbers* should "enter the name of the entity to which [it] gave numbers" in the Notes/Assignee field, and the provider reporting the receipt of the *intermediate numbers* should "enter the name of the entity from which [it] received numbers."[74]

29. The NANC and state commissions have raised several concerns regarding NRUF reporting compliance, particularly regarding *intermediate numbers*.[75] They assert that lack of compliance with the Commission's NRUF reporting rules makes it difficult or impossible to know how numbering resources are ultimately being used, or to calculate exhaust,[76] and, "contribute to the limited visibility into

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Ported numbers are classified as *assigned numbers* by the provider of record in the NANPA's numbering administration system and not reported by the receiving provider.

[69] *First VoIP Direct Access Report and Order*, 30 FCC Rcd at 6853, para. 30, *citing* 47 CFR § 52.15(f)(iii) ("*Assigned numbers* are numbers working in the Public Switched Telephone Network under an agreement such as a contract or tariff at the request of specific end users or customers for their use, or numbers not yet working but having a customer service order pending").

[70] *First VoIP Direct Access Report and Order*, 30 FCC Rcd at 6854, para. 32.

[71] *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7594, para. 40.

[72] 47 CFR § 52.15(f)(5)(i).

[73] INC NRUF Guidelines, at § 6.2.

[74] Geographic NRUF Form 502, "Instructions" tab, https://www.nanpa.com/sites/default/files/2024-05/Jun16_NrufForm502Geo.xlsm (last visited Mar. 2, 2026).

[75] *See, e.g.*, MPUC PUC Reply, WC Docket No. 13-97 et al., at 2 (rec. Dec. 28, 2023) (MPUC Reply) ("Some of these NRUF problems include incorrect reports with numbering categories that are entirely inaccurate. In other situations, iVoIP providers that are wholesaling numbers fail to list the names of their wholesale customers as required.").

[76] NANC CATA Report at 13 ("Inconsistent reporting on wholesale and enterprise customer transactions leads to gaps in the NRUF data. Reporting discrepancies can make it difficult for federal and state regulators to assess the true utilization of numbering resources and the potential risks of area code exhaustion.").

the full scale of number utilization in the secondary market."[77] These problems are magnified where "the wholesale of telephone numbers may be layers deep."[78]

30. These parties claim that many reporting providers are not following their *intermediate number* reporting obligations for several reasons potentially extending beyond what might be characterized as deliberate non-compliance, including: (1) not understanding their reporting obligations or interpreting those obligations differently;[79] (2) an inability to know how their numbering resources are being used by the downstream entity;[80] or (3) internal company organization and provisioning systems that may conflict with the way NRUF reports are structured.[81] NARUC claims that many service providers receiving *intermediate numbers* often do not comply with their obligation to file and, even when they do, do not provide the names and contact information of the service providers providing the numbers, in some cases claiming to state commission staff that privacy and legal concerns make them "reluctant" to provide this information (and sometimes completely refusing to do so).[82] Further, NARUC argues that state commission staff have observed a "lack of consistency and adequacy in the completion of the 'Notes/Assignee' field [in FCC Form 502]."[83] We seek comment on these assertions, any other patterns of NRUF non-compliance, and the effect non-compliance may have on the underlying goals of reporting to track numbering resource utilization and the right to use numbering resources.

31. *Improving NRUF Form Data.* We seek comment on ways in which our collection of data through NRUF reports can be improved to aid detection of, and enforcement efforts against, illegal robocalls, as well as to inform numbering administration and policy development. In addition, we seek comment on ways that FCC Form 502 can be improved, generally, including aspects of the form (and related rules) that may impose significant costs upon private parties that are not outweighed by public benefits. The communications marketplace has substantially evolved since the five mandatory numbering resource use reporting categories were established roughly 26 years ago, at the dawn of thousands-block numbering resource assignment and long-term local number portability solutions, and well before the development of interconnected VoIP service and the proliferation of resale. Therefore, the *intermediate*

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[77] NANC CATA Report at 14. *See also*, *supra* n.11.

[78] MPUC Reply at 3; *see also* NANC CATA Report at 13 ("[C]urrent NRUF reporting does not always reflect the full picture of how numbering resources are used by [intermediate reporting] providers, particularly when numbers are passed through multiple levels of wholesale providers.").

[79] *See, e.g.*, State NRUF PRA Comments at 3; NANC CATA Report at 14.

[80] NANC CATA Report at 13 ("Some service providers are unaware of how their numbers are being used by their customers or by their customer's customers."); MPUC Reply at 3 ("In conversations with service providers that wholesale telephone numbers, the MPUC has learned that some of these wholesalers are unsure of the status of their telephone numbers.").

[81] *See* NANC NAOWG Report at 16-17 ("Different companies may structure resale of numbering resources differently. For example, one provider may not provide numbers to providers for future assignment where others only provide numbers as they are assigned by the wholesale customer to their end user customers. Providers with direct access . . . may make their numbering resources available to their wholesale customers or resellers via a mechanized interface.").

[82] NARUC White Paper at 8.

[83] *Id.* at 7; NANC CATA Report at 14 ("For the limited number of providers utilizing the intermediate category, the notes field appears to be underutilized. Only a limited number of providers with wholesale intermediate customers are reporting block activity in the U3 category."); State NRUF PRA Comments at 4 ("For numbers included in the intermediate category, the notes/assignee column identifying the other service providers that have obtained the intermediate numbers on the U-1 and U-3 Forms is sometimes left blank, leaving state Commissions unclear on the identity of the service provider using the intermediate numbers.").

number category is likely not adequately serving current needs for many of the reasons that the NANC and state commissions have identified.

32. We propose to create a revamped set of obligations regarding *intermediate numbers*, superseding all previous rules, orders, and documents regarding these obligations, including FCC Form 502 and its instructions. Specifically, we propose to split the current *intermediate number* category into three subcategories—*intermediate assigned*, *intermediate other*, and *intermediate available*—to clearly describe the status of the numbers from the perspectives of both the provider of record (the provider that directly holds the numbering resources in the NANPA system) and the service provider reselling those telephone numbers (categorizing its numbering resources as if it had received them directly) when the provider of record provides its NRUF data.

33. As a foundational matter, we propose to retain a definition of *intermediate numbers*, generally, that refers to numbers that the provider of record has made available to resellers of their telephone numbers for the purpose of provisioning to such resellers' end users (including enterprise customers), regardless of whether the numbers are made available on a just-in-time (as needed/ordered by the end users) basis or allocated to the reseller of telephone numbers as inventory for the latter's exclusive use.[84] This definition continues to apply to such numbers until they are no longer being provided by the provider of record to the reseller.

- *Intermediate assigned numbers* are numbers that are *intermediate numbers* and, from the perspective of the reseller, *assigned numbers*.
- *Intermediate other numbers* are numbers that are *intermediate numbers* and, from the perspective of the reseller, either *administrative numbers*, *aging numbers*, *intermediate numbers used for further resale*, or *reserved numbers*.[85]
- *Intermediate available numbers* are *intermediate numbers* that, from the perspective of the reseller, are *available numbers*. This category would not need be to reported, just as providers are not required to report *available* numbers – *intermediate available numbers* would be a residual subcategory, that could be derived mathematically from the other subcategories within *intermediate numbers*.[86]

34. We propose that the provider of record bear the burden of determining the status of its *intermediate numbers* by obtaining any necessary information from the service providers reselling its numbers. Providers of record are presumptively fully capable of updating their wholesale contracts to require their receipt of such information from their resellers—particularly on the mere biannual basis that NRUF reporting requires. If providers of record are unable or unwilling to fulfill this requirement, it suggests they may not have sufficient knowledge of their resellers. In such cases, we propose treating their NRUF forms as deficient. We also propose to codify the obligation for reporting providers to identify their resellers (if any) on FCC Form 502 and provide meaningful contact information for such customers.

35. Specifically, we propose to modify FCC Form 502 to create clearly labeled entries for the name and contact information for each reseller which would include the reseller's FCC Form 499 Filer ID

[84] Our proposed rule uses the shorter term "reseller" rather than "reseller of telephone numbers," although it reflects this proposed definition. *See* Appendix A, proposed revisions to 47 CFR § 52.15(l)(1)(B).

[85] The *intermediate other number* category may be useful in calculating "contamination" levels used by the NANPA for various purposes. *See* INC TBACOCAG Guidelines, at 172 (definition of contamination). *See also*, *e.g.*, *id.* at 52, § 7.1.7(c), 54, § 7.1.13, 62, § 8.1.1(t), 71-72, § 8.3.4(e) (relevance of contamination levels).

[86] *See Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7592, para. 35.

and, if available, OCN.[87] We seek comment on the extent to which it is feasible to create a method by which information could be clearly provided when multiple resellers receive numbers in a particular block, such as a means by which individual ranges of numbers within a block could be indicated. We propose to use the same definition of reseller of telephone numbers for the purpose of NRUF reporting as we propose for expanding the certification obligations discussed in Section III, above. Is this definition appropriate for NRUF purposes? Is our presumption correct that providers of record are fully capable of updating their wholesale contracts to require provision of such information from their resellers on a biannual basis?

36. Creating three *intermediate number* subcategories should serve to significantly reduce the potential for confusion and omissions in NRUF reporting of numbering resources provided to resellers, as identified by the NANC and state commissions. Do commenters agree? These differentiated categories should also serve to present useful information to the NANPA and for enforcement efforts and policymaking. Do commenters agree? What suggestions, if any, do commenters have for how this proposal could be improved?

37. Should we adopt additional mandatory reporting subcategories to better track the ways in which numbers are being used? For example, should we adopt a specific subcategory to report numbers offered for a trial period or for numbers used for cycling to ensure that their use is adequately tracked? If so, how should such a subcategory be defined? Should we require providers to file reports on some or all of the subcategories of numbers on which providers currently must only keep internal reports?[88] Should we adopt other reporting subcategories?

38. As part of proposing these new subcategories, we also propose to update the method of calculating the numbering resource utilization level used to determine whether a service provider has met the required 75% utilization threshold for its existing inventory, that allows it to request additional numbering resources in a geographic area.[89] Today, the 75% threshold only includes *assigned numbers*.[90] We seek comment on whether *intermediate assigned numbers* should also be included in calculating utilization levels.

39. How do commenters suggest that the Commission ensure the NANPA receives information about numbers provided to resellers? Should such resellers be required to identify themselves as resellers and, if so, should they be required to identify the source of particular numbers? Do commenters agree that providers of record should bear the burden of collecting information from their resellers? Are there any facts of which we should be aware regarding particular reseller relationships,

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[87] We note that wholesale providers seeking to avail themselves of the safe harbor for FCC Form 499 filers seeking to classify revenue as from resellers that contribute to the Universal Service Fund, rather than from end users, are already required to collect and retain from their resellers the reseller's: (1) FCC Form 499 Filer ID; (2) legal name; (3) legal address; (4) name of a contact person; (5) phone number of the contact person; and (6) an annual certification by the reseller regarding its reseller status. FCC, 2026 Telecommunications Reporting Worksheet Instructions (FCC Form 499-A), at 38 (Nov. 2025), https://www.usac.org/wp-content/uploads/service-providers/documents/forms/2026/2026-FCC-Form-499A-Form-Instructions.pdf. We note that the use of the safe harbor is not required, but those that do not provide the information above must submit other reliable proof that is analyzed on a case-by-case basis by the USAC for compliance.

[88] *See Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7601, para. 60 & n. 104 ("The 8 subcategories are: (1) soft dialtone numbers; (2) ported-out numbers; (3) dealer number pools; (4) test numbers; (5) employee/official numbers; (6) Local Routing Numbers; (7) Temporary Local Directory Numbers; and (8) wireless E911 emergency services routing digits/key (ESRD/ESRK) numbers").

[89] *See* 47 CFR § 52.15(h).

[90] *See id.* § 52.15(g)(4)(ii).

such as facilities-based wireless providers with mobile virtual network operators (MVNOs), for which we should account in any reporting requirements we adopt?[91]

40. Further, we seek comment on whether resellers, regardless of whether they already obtain other numbering resources directly from the NANPA,[92] should be required to file their own NRUF reports. Should all resellers of telephone numbers be required to categorize numbers they resell as *intermediate numbers* (by the proposed three *intermediate number* subcategories), just as providers of record report such numbers, regardless of if and how they currently report them? If the NRUF form were adequately revised, it may be possible to cross-check how reporting providers and resellers are reporting the same telephone numbers. This ability to cross-check may have benefits in measuring and increasing the accuracy of usage statistics, enhancing numbering management, and enabling and supporting enforcement actions against those who abuse numbering resources. Do commenters agree with these potential benefits? We acknowledge that our rules envision recipients of *intermediate numbers* to include "non-carrier entities,"[93] such as retail dealers and unified messaging providers.[94] If we were to require resellers of telephone numbers to file NRUF reports, should non-carrier entities be included? Does our jurisdiction under section 251(e)(1) extend to such entities? Would it be more efficient for the Commission to focus its scrutiny and enforcement efforts on LECs, CMRS providers, and interconnected VoIP providers, holding such entities responsible for knowing their customers and gathering adequate data from such customers, rather than to also require non-carrier entities to file NRUF reports?

41. Are there other changes that we should make to NRUF reporting requirements? Is the current reporting cycle of every six months an appropriate interval? Are there additional steps we should take to ensure the veracity and accuracy of NRUF reporting that might also later serve as the basis for numbering audits?[95] Should we create an expedited method by which the NANPA, at the direction of the Wireline Competition Bureau (Bureau), may obtain supporting information for a service provider's usage forecasts? The NANPA, Commission staff, and state commissions have experienced difficulty contacting service providers that only provide one point of contact in the NANPA system. Should all service providers be required to provide a backup point of contact? Currently, the NANPA has the authority to withhold additional numbering resources from service providers that fail to file NRUF reports.[96] The NANPA would not, however, have this remedy available for resellers that fail to file NRUF reports, but do not directly obtain numbering resources. We invite commenters to suggest appropriate remedies. For example, if a reseller of telephone numbers fails to file NRUF reports, would it be reasonable for the NANPA to withhold additional numbering resources from any affiliates under common ownership or control with such reseller that receive numbers directly from the NANPA? Should the service provider supplying the numbering resources to the reseller have additional numbering resources withheld?

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[91] Regulatory fees for CMRS providers have traditionally been based on the quantity of numbers reported as *assigned numbers*. *See*, *e.g.*, *Review of the Commission's Assessment and Collection of Regulatory Fees for Fiscal Year 2025*, *Assessment and Collection of Space and Earth Station Regulatory Fees for Fiscal Year 2025*, MD Docket Nos. 25-190, 24-85, Report and Order, FCC 25-52, para. 75 (rel. Aug. 29, 2025). We intend to address separately the effect of any proposals that we adopt in this proceeding regarding NRUF reporting on how regulatory fees for CMRS providers are determined.

[92] *See Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7594, para. 40.

[93] *See* 47 CFR § 52.15(f)(1)(v); *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7586, para. 20.

[94] *See* 47 CFR § 52.15(f)(1)(v); *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7586, para. 20.

[95] *See* 47 CFR § 52.15(k).

[96] *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7609-10, para. 84.

42. Finally, we note that the local number portability databases (comprising the National Portability Administration Center or NPAC) enable a parallel reporting scheme for resellers of telephone numbers in which the current service provider for a ported number can enter an identification code for resellers of their service, such as MVNOs. Reporting this code in the ALTSPID data field is currently optional.[97] As part of our proposals to increase visibility into resale relationships, we propose to take the related action of directing the Local Number Portability Administrator to make entries in the ALTSPID field mandatory when a reseller relationship exists for the ported number. Especially with resale now increasingly prevalent, it is important that the Commission be able to determine the manner in which service is provisioned on ported numbers when porting difficulty arises. For example, we are increasingly concerned about scenarios in which an interconnected VoIP reseller fails to pay its wholesale supplier of numbers and the reseller suddenly goes out of business, leaving its retail customers without the usual means of porting their telephone numbers elsewhere, and we seek to use any means at our disposal to aid these consumers. Not only do interconnected VoIP providers reselling the service of numbering partners or other interconnected VoIP providers have obligations to facilitate ports, but so do the facilities-based providers through which they get the numbers.[98]

43. We recognize that our NRUF reporting proposals, if adopted, would not exist in a vacuum. Industry guidelines and procedures would need to be adapted, as would NANPA systems. In light of this, we propose that any changes or clarifications of reporting that we adopt would apply to the first NRUF reporting period starting at least 12 months after the effective date of the order promulgating these rules.[99] This will ensure 12 full months of guideline and system development by the NANPA before reporting providers would begin using the new definitions in their systems. We seek comment on this proposed implementation timeline and, in addition, we seek comment on whether we should establish a later implementation deadline for current providers of record that are small entities and, if so, what it should be and how we should define small entities for such purposes.

44. We invite commenters to propose alternatives and other improvements to NRUF reporting requirements. Are there better means of tracking the chain of custody of numbering resources, such as, perhaps, new databases that could be established (perhaps using distributed ledger technology such as blockchain) or changes that could be made to existing databases to improve this? If so, we seek information on these alternatives and other improvements, including the cost of such options and how long they would take to implement. Are there industry efforts already underway that could be useful in

[97] Number Portability Industry Forum, Number Portability Best Practice #76 (Oct. 4, 2021), https://workinggroup.numberportability.com/sites/workinggroup/files/2022-09/0076_-_AltSPID-LastAltSPID_field_population_v1.docx. The Commission does not have a rule or an order addressing this matter. The current optionality of providing the ALTSPID data in the NPAC is distinct from the manner in which ported numbers are reported for NRUF purposes. In NRUF reports, the provider of record continues to be the provider of record of a ported number and continues to report it as *assigned*, and the ported number is "not counted" by the present and any future receiving service provider(s) in NRUF reporting. Geographic NRUF Form 502, Instructions tab, https://www.nanpa.com/sites/default/files/2024-05/Jun16_NrufForm502Geo.xlsm (last visited Mar. 2, 2026).

[98] For a more detailed explanation of these obligations, *see Wireline Competition Bureau Reminds Interconnected VoIP Providers of Their Local Number Portability and Section 214 Discontinuance Obligations*, WC Docket Nos. 04-36, 07-243, & 07-244, CC Docket No. 95-116, Public Notice, DA 25-878 (WCB rel. Sept. 22, 2025).

[99] Thus, for example, if the pertinent order were to become effective March 26, 2027, numbers the new categories would apply to the NRUF reporting period of July 1, 2028 through December 31, 2028, for which NRUF reports would be due February 1, 2029.

this regard?[100] If so, what are they and what is the expected timeline and cost for their development and implementation?

45. Finally, in addition to the proposals and matters on which we seek comment described above, we also propose to make housekeeping edits within section 52.15 of the Commission's rules. These include correcting the definition of the utilization threshold to cross-reference the current location of the definition of how utilization is to be calculated, removing references to events that have already passed, and changing outdated references to the Common Carrier Bureau to reference the Bureau. We seek comment on these proposed edits as well.[101]

B. Limiting Resale of Numbering Resources to a "Single Level"

46. Numbering resale makes illegal robocall enforcement more difficult because it can mask the parties in interest, as well as the parties with relevant data.[102] This problem is magnified when there are multiple levels of resale. We are also concerned that the more remote the party providing the number to the end user is from the full set of requirements imposed on service providers directly drawing numbering resources, the worse steward it will be of such resources.[103] The former NANC had observed the challenges posed by multiple levels of resale in observing that "[e]ach layer of resale introduces additional challenges to visibility regarding where multiple providers are in the use of numbers, as secondary providers may not always be required to provide detailed reporting on numbers associated with the wholesale services purchased from upstream providers."[104]

47. Robocall enforcement actions have often involved multiple layers of resale. For example, Avid Telecom, the collection of entities serving as defendants in an Anti-Robocall Multistate Litigation Task Force action that involved roughly 20 billion unwanted calls in just over a four-year period, was not itself a direct recipient of numbering resources from the NANPA,[105] and, held itself out as a wholesale provider.[106] The Task Force's complaint against Avid Telecom referenced additional levels

[100] *See*, *e.g.*, Chris Wendt, Somos, Inc., VESPER Framework: A Path to RTU and Verifiable Trust for Telephone Numbers, https://www.sipforum.org/download/7-evolving-trust-in-telephone-numbers-an-industry-update-on-the-vesper-framework-rtu-and-transparency-advances/?wpdmdl=5489 (last visited Mar. 2, 2026).

[101] *See* Appendix A, proposed revisions to 47 CFR §§ 52.15 (f)(6)(i)-(ii), 52.15(h), 52.15(k)(3).

[102] *See supra* n.11.

[103] We recognize that the proposals in Section IV.A of this Notice requiring resellers of telephone numbers to make certain certifications could also help ameliorate robocall issues relating to resale.

[104] NANC NAOWG Report at 11. *See also* NANC CATA Report at 12 ("And resellers can sell to other resellers, which further obscures visibility into the ultimate use of numbers."); MPUC Reply at 3 ("The MPUC also believes that the wholesaling of telephone numbers may be layers deep with the initial IVoIP or CLEC receiving numbering resources selling or distributing those numbers to a wholesale customer who then in turn resells or redistributes those numbers").

[105] Commission Staff analysis of numbering resource assignment data.

[106] Complaint and Demand for Jury Trial, State of Arizona ex rel. Mayes, et al. v. Michael D. Lansky, LLC, dba Avid Telecom, et al., Case No. 4:23-cv-00233 at 20, ¶ 70, 24-26 ¶ 88(a-h) (D. Az. May 23, 2023) (Multistate Avid Telecom Complaint) (with respect to wholesale services and with respect to the quantity and timing of unwanted calls, respectively). Avid Telecom is the assumed name of the defendants in the Multistate Avid Telecom Complaint. *Id.* at 6-8, ¶¶ 10-18.

of resale in the robocalling scheme.[107] Indeed, FCC Enforcement Bureau staff encounters multiple levels of reselling numbers in the majority of its robocall investigations.[108]

48. Above, we propose to create a more robust NRUF reporting system for resale and seek comment on requiring resellers of telephone numbers to file their own reports. Recognizing that the problem of illegal robocalls has been so intractable for Americans, we seek comment on whether we need to affirmatively limit the extended levels of resale that are seemingly contributing to the problem. As a means to ensure visibility into how numbering resources are being used, and to lessen attenuated relationships between the providers of record of numbers and the retail providers of those numbers, we seek comment on whether we should prohibit the resale of numbers beyond a single level, whether in addition, or as an alternative, to expanded NRUF reporting for resellers. That is, resellers of telephone numbers may only provide retail service to their own end users, and may not provide wholesale service. Are service providers directly receiving numbering resources from the NANPA capable of adequately enforcing this limitation contractually through resale restrictions in their wholesale contracts? Do all or virtually all wholesale contracts include change of law clauses that could accelerate implementation if we were to amend our rules to add this limitation? We seek comment on whether to enforce this restriction against both the service provider who received the numbers directly from the NANPA and the entity which received them from the service provider and is reselling in violation of the restriction, and whether to hold both entities jointly and severally responsible in any enforcement actions. Are there other means by which such a restriction could be enforced such as, for example, by state commissions? Also, what would be an appropriate time period for implementing such a restriction?

49. What are the drawbacks of limiting resale to a single level of numbering resources? Do resellers of telephone numbers below the first level perform any uniquely useful and competitive function that is meaningful in the voice communications marketplace? If so, what is it? Is there an alternative way to achieve the same goals that restricting resale to a single level may achieve, assuming that resellers do not have their own NRUF reporting obligations? Could a system in which wholesale providers must register their relationships with resellers of their telephone numbers with the Commission serve to meet at least some of these goals? Should we hold the resellers responsible for all violations of the Commission's rules committed with the numbers they resold? Would that provide the correct incentives to conduct due diligence and only resell numbers to trustworthy numbering partners?

50. We seek comment on whether restricting resale of numbering resources to a single level may conflict with existing statutory obligations. The Commission has previously concluded that restricting resale of common carrier communications services is an unjustly discriminatory practice, classification, and regulation under section 201(a), which is unlawful under section 201(b).[109] In addition, section 251(b)(1) of the Act (and section 51.603 of our rules) imposes a duty on all LECs not to "prohibit, and not to impose unreasonable or discriminatory conditions or limitations on, the resale of [their] telecommunications services."[110] At the same time, we note that section 6(a) of the TRACED Act grants

[107] *Id.* at 78, ¶¶ 375-76.

[108] *See, e.g.*, *Sumco Panama Forfeiture Order*, 38 FCC Rcd at 7250, para. 35 (describing how an auto warranty robocall operation used resellers to obtain over a million numbers); *Spiller Reconsideration Order*, 38 FCC Rcd at 5584, para. 6 n.20 (citing evidence showing multiple levels of resell).

[109] *Regulatory Policies Concerning Resale and Shared Use of Common Carrier Services and Facilities*, Docket No. 20097, Report & Order, 60 FCC 2d 261, 280-82, paras. 34-37 (1976), *aff'd on recon.*, 62 FCC 2d 588 (1977), *aff'd sub nom.*, *AT&T v. FCC*, 572 F.2d 17 (2d Cir. 1978), *cert. denied*, 439 U.S. 875 (1978).

[110] 47 U.S.C. § 251(b)(1); 47 CFR § 51.630. The Commission has forborne the 251(b)(c)(4) avoided-cost resale obligation. *Accelerating Network Modernization Notice of Proposed Rulemaking*, FCC 25-37 (seeking comment on deregulatory options to encourage providers to build, maintain, and upgrade their networks); *Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services*, WC Docket No. 19-

(continued….)

the Commission broad authority to take sufficient steps to reduce access to numbers by potential robocallers.[111] We seek comment on what actions, if any, the Commission may have to take regarding sections 201(a), 202(b), and 251(b)(1) of the Act, and in potentially modifying section 51.603 of our rules, to effectuate limiting resale of numbering resources to a single level. For example, would such a limitation be reasonable under section 6(a) of the TRACED Act, and therefore fully compliant with sections 201(b) and 251(b)(1)?

V. OTHER POTENTIAL MEASURES TO STRENGTHEN NUMBERING POLICIES TO COMBAT ROBOCALLS

A. Addressing Number Cycling

51. We seek comment on whether or how the Commission should address robocalling that uses number "cycling" (or "rotation")—the use of a typically large quantity of telephone numbers, each used on a rotating basis as few as one or two times, often assigned by service providers to end users on a short-term or "trial" basis.[112] An illegal robocaller may be motivated to use number cycling as a way to evade provider and third-party analytics that flag numbers commonly used for placing robocalls, causing calls from such numbers to be blocked.[113] The practice of number cycling can be particularly nefarious because calls originating with cycled numbers can receive the highest STIR/SHAKEN attestation level as if they were legitimate calls, as distinguished from caller ID spoofing, which STIR/SHAKEN is capable of identifying and preventing.[114] Although there may be legitimate uses of number cycling, as discussed below, misuse of number cycling is not only bad for consumers, but also detrimental to numbering resource management and conservation efforts.

52. According to data from voice security and intelligence company Hiya, 18% of all reported unwanted calls in the United States originate from numbers with minimal call history.[115] The scale of some number cycling campaigns can be enormous. In enforcement actions against robocalling operations involving number cycling, robocallers have used millions of numbers for this purpose.[116] The Anti-Robocall Multistate Litigation Task Force noted that one particular operation routed more than 4.5 billion calls in less than two years using 474.8 million different telephone numbers, 72% of which were

308, Report and Order, 35 FCC Rcd 12424, 12497-509, paras. 143-64 (2020) (with respect to non-price cap incumbent LECs); *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141, Memorandum Opinion and Order, 34 FCC Rcd 6503, paras. 38-55 (2019), *aff'd sub nom.*, *COMPTEL v. FCC*, 978 F.3d 1325 (D.C. Cir. 2020).

[111] *See* TRACED Act § 6(a)(1), 47 U.S.C. § 227b-1(a)(1); *see also* 47 U.S.C. § 227(b)(1)(A), (B) (restricting the making of calls using an automatic telephone dialing system or an artificial or prerecorded voice message). We discuss the application of the TRACED Act to proposals in this Notice in greater depth in Section VII below.

[112] *See* NANC CATA Report at 17-18.

[113] *See*, *e.g.*, ZipDX LLC Comments, WC Docket No. 13-97 et al., at 4, 5-6 (filed Nov. 23, 2023) ("Callers rotating through numbers circumvent the goals of the TRACED Act as well as the efforts of the FCC and providers to block illegal calls."); National Consumer Law Center and Electronic Privacy Information Center et al. Reply, WC Docket No. 13-97 et al., at 3 (Dec. 22, 2023) (NCLC 2023 Reply).

[114] *See* Letter from Margot Saunders, Counsel, National Consumer Law Center, and Chris Frascella, Counsel, Electronic Privacy Information Center, to Marlene H. Dortch, WC Docket No. 13-97 et al., at 1-2 (filed Mar. 25, 2024) (with respect to STIR/SHAKEN authentication level) (NCLC/EPIC *Ex Parte*).

[115] Tim Spillane, *Hiya fights number rotation with innovative new modeling* (Jan. 16, 2025), https://blog.hiya.com/hiya-fights-number-rotation.

[116] NCLC/EPIC *Ex Parte* at 4-6.

used to make just one call.[117] Five operations conducted by the same defendant, Avid Telecom, represented billions more calls and used between 71% and 84% of the telephone numbers just once.[118]

53. Services enabling call cycling are readily available. One company, for example, states that its "Auto Rotate Number" service can "[e]nhance your calling strategy with auto rotate number for each call," to "[d]isplay customers a different number each time and avoid spam markings."[119] While services enabling number cycling obviously do not overtly advertise their ability to aid in illegal robocall campaigns, their ability to enable them is apparent. Sometimes these services are marketed (or camouflaged) as privacy enhancing, allowing "you [to] avail [yourself of] ad-free services which mean that they will not call you for showing you their ads, they won't put your name at the online directories and many more,"[120] or allowing a business engaged in "legitimate outbound operations" to not have to rely on a limited quantity of outbound telephone numbers that have presumably been inappropriately tagged by robocall analytics.[121]

54. However, there may be legitimate uses of number cycling. For example, the NANC observed that legitimate callers may engage in number rotation practices based on "the perception, fueled by call completion metrics, that anti-robocalling analytics are accidentally labeling and blocking their calls to their customers."[122] As a result, the NANC observed, these legitimate callers believe that number rotation is an "effective and warranted countermeasure."[123] Hiya has observed that robocallers using rotated numbers must be distinguished from enterprises with large call volumes, small businesses with lower call activity, and personal lines with occasional usage,[124] having reported in 2023 on a survey of 300 business leaders that 60% said they rotate numbers at least multiple times a month, and 29% change their numbers automatically or on a daily basis.[125]

55. We seek information on how frequently number cycling is used for illegal robocalling campaigns. How frequently is it used, not for illegal robocall campaigns, but rather to avoid legitimate calls from being incorrectly tagged as likely illegal robocalls? To what extent is short-term, provisional use of numbers associated with number cycling used for robocall campaigns? To what extent are these numbers provided on a "trial" basis? Are there legitimate reasons for a service provider to provide large blocks of numbers on a "trial" basis? And even if there are legitimate reasons, should there nonetheless be restrictions on this practice for reasons other than mitigating robocall activity (e.g., preventing number exhaust)?

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[117] Multistate Avid Telecom Complaint at 24, ¶ 88(a).

[118] *Id.* at 24-26, ¶ 88(b-f).

[119] CallHippo, *Auto Rotate Number*, https://callhippo.com/auto-rotate/ (last visited Mar. 2, 2026). *See also*, *e.g.*, KLOZER.io, *What does a DID Rotation Do in Increasing Your Sales Call Acceptance?* (Mar. 2, 2025), https://klozer.io/what-does-a-did-rotation-do-in-increasing-your-sales-call-acceptance/.

[120] Dialinger, *No. 1 Auto Rotate Number: Dialinger Virtual SIM Service*, https://dialinger.com/auto-rotate-number/ (last visited Mar. 2, 2026).

[121] convoso, *Why Call Center Numbers Get Marked as Spam and How to Boost Contact Rates*, https://www.convoso.com/blog/phone-number-marked-as-spam/ (last visited Mar. 2, 2026).

[122] NANC CATA Report at 12.

[123] *Id*.

[124] Tim Spillane, *Hiya fights number rotation with innovative new modeling* (Jan. 16, 2025), https://blog.hiya.com/hiya-fights-number-rotation.

[125] Michelle Wallace, *Number rotation undermines consumer spam protections — here's what carriers can do about it* (June 28, 2023), https://blog.hiya.com/number-rotation-undermines-consumer-spam-protections-kyc-recap.

56. We seek comment on whether and to what extent we should develop rules aimed at prohibiting or limiting number cycling. It seems that in certain cases, potentially legitimate uses of number cycling, if there are any, may be the response by non-robocallers that have a need to avoid their telephone numbers from being incorrectly tagged by data analytics as illegitimate.[126] To what extent do commenters believe this to be the case? We request any further detail, using concrete examples, that commenters are able to provide. Are potentially legitimate uses of number cycling even effective at achieving their goals?[127] Are there ongoing improvements in call analytics that are lessening or obviating any legitimate need for number cycling? Do the harms of allowing number cycling outweigh any potentially legitimate benefits?

57. If we were to develop rules prohibiting number cycling, how should it be defined, particularly if we also want to avoid barring number cycling that is not part of illegal robocall campaigns? What parameters do commenters suggest? Should we prohibit the provision of trial numbers? If so, how would we define the provision and use of trial numbers and how would compliance be monitored? Are there readily-available statistical indicia of number cycling, such as a service provider reporting a large quantity of telephone numbers from the same number blocks as disconnected in the Reassigned Numbers Database?[128] Are trial numbers being aged for the minimum 45 days[129] and being reported in the Reassigned Numbers Database?

58. Should both wholesale providers and their reseller customers bear responsibility for compliance under any number cycling and trial numbers rules that we might adopt? Should responsibility be limited to service providers that receive numbers directly from the NANPA, or to all service providers in the chain? Do multiple layers of resale exacerbate misuse of cycled numbers? We invite suggestions for any similar or alternative approaches to addressing illegal robocall-enabling number cycling and issues with trial numbers. We also seek comment on the appropriate implementation period for any rules that we may adopt regarding these issues. In addition, we seek comment on whether we should establish a later implementation deadline for current providers of record that are small entities and, if so, what it should be and how we should define small entities for such purposes.

B. Removing Administrative Barriers to Stopping Numbering Fraud and Abuse

59. We seek comment on new ways the Commission, with assistance from the state commissions and the NANPA, can better identify fraudulent use and misuse of telephone numbers. As recent state commission filings demonstrate, the state commissions and the NANPA are often the first line monitors and detectors of abuse, and we seek comment on how we can empower them to act.

60. *Increasing State Commission Access to NRUF Data*. First, we seek comment on expanding the numbering data available to state commissions to enable them to better assist our efforts to fight robocalling and other abuses of numbering resources. Since the 2000 *Numbering Resource Optimization First Report and Order* establishing NRUF reporting, state commissions have had access to service provider-specific disaggregated data to "effectively carry out number administration duties"

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[126] See, *e.g.*, NANC CATA Report at 12 ("One important reason legitimate callers may acquire large quantities of telephone numbers and use number rotation dialing practices is the perception, fueled by call completion metrics, that anti-robocalling analytics are accidentally labeling and blocking their calls to their customers and that number rotation is an effective and warranted countermeasure").

[127] For discussions of the efficacy of potentially legitimate number rotation, *see*, *e.g.*, Chris Sorensen, *The Dirty Truth About Number Rotation: Why It's Killing Your Trust, Brand, & Answer Rates* (July 7, 2025), https://www.phoneburner.com/blog/number-rotation-kills-answer-rates; Mary Gonzalez, *A Reminder to Rethink Number Rotation Solutions* (July 27, 2023), https://www.numeracle.com/insights/rethinking-number-rotation.

[128] *See* 47 CFR § 52.15(f)(8).

[129] *Id.* § 52.15(f)(1)(ii).

delegated to them.[130] The Commission concluded that if state commissions did not have access to numbering data "their ability to carry out these delegations of authority would be hampered . . . ."[131] This includes, among other things, deciding whether to affirm a NANPA determination that numbering resources should be withheld because of a failure to file accurate or timely NRUF data.[132] The Commission initially granted state commissions access to this data subject to confidentiality protections.[133] The *Numbering Resource Optimization Third Report and Order* then granted state commissions "password-protected access to the NANPA database" again subject to confidentiality protections.[134] The Commission, however, restricted state commission access to data from the rate centers and area codes within that state as "a further measure of protection for such data . . . ."[135]

61. Given the evolution and complexity of today's numbering marketplace, and the often attenuated relationship between the geographic location of an area code and the geographic location of the calling party using a number from that area code,[136] we now seek comment on revisiting our decision barring state commission access to out-of-state provider-specific disaggregated NRUF data. We seek comment on whether out-of-state access will allow the state commissions, the NANPA, and the Commission to work better together to identify patterns in the NRUF data to identify bad actors abusing numbering resources, and could provide the necessary tools allowing state commissions to take more direct action to withhold numbering resources, as outlined below. Are there state or federal data protection or privacy laws and rules that would preclude expansion of state commission access to NRUF data? What additional confidentiality protections, if any, should we impose on such expanded access?

62. We seek specific comment on whether and to what extent we should put any limits on state commission access to out-of-state provider-specific disaggregated data. For example, should we allow one state (State A) to obtain NRUF data related to another state (State B) only if the data in State B relates to the same provider or an affiliate of the provider operating in State A? Would any other access limit be appropriate? Does the NANPA currently collect sufficient information on the NRUF form to be able to segregate data in this manner and only display the data that a state commission would be entitled to see? If not, should the Commission modify the NRUF form in some fashion and/or direct the NANPA to change its system to allow for that?[137] What, if any, other data would need to be collected in the NRUF reporting to support appropriate data segregation? Should we instead not impose any limits on state commission access to out-of-state numbering data other than the existing confidentiality requirement? We believe that doing so would make administration of state commission access easier because there would be less need and burden to tailor access by state commission and provider. However, it may raise additional confidentiality and data protection concerns. We seek comment on the balance of the benefits and drawbacks of broad state commission access.

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[130] *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7608, para. 80.

[131] *Id.* at 7608, para. 81.

[132] 47 CFR § 52.15(g)(5) ("The state commission may affirm, or may overturn, the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has complied with the reporting and numbering resource application requirements herein.").

[133] *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7608-09, paras. 81-82.

[134] *Numbering Resource Optimization et al.*, CC Docket No. 99-200 et al., Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, 17 FCC Rcd 252, 309, para. 134 (2001) (*Numbering Resource Optimization Third Report and Order*).

[135] *Numbering Resource Optimization Third Report and Order*, 17 FCC Rcd at 310, para. 137.

[136] *See*, *e.g.*, Maine Staff February 2026 Reply at 6; NCLC 2023 Reply at 4-6.

[137] We note that such a change would likely require an increase in the contract price.

63. Observing that section 251(e)(1) of the Act states that the Commission has the authority to delegate any portion of its jurisdiction under the provision to "[s]tate commissions or *other entities*,"[138] we also seek comment on whether and to what extent we should provide the same access to other state entities, such as state attorneys general. Should state attorneys general have access to provider-specific disaggregated NRUF data only on request and for certain specific purposes? What other restrictions, if any, should be placed on state attorney generals or other state entities' access to numbering data? How much time should we allow for implementation if we expand access in this manner?

64. *Additional Bases for Withholding Numbering Resources for Violation of Commission Rules and Orders*. We next seek comment on whether and under what circumstances we should delegate to state commissions greater authority to restrict access to numbering resources beyond what is currently in our rules.[139] Specifically, we seek comment on delegating to the state commissions the authority to direct the NANPA to deny a service provider access to additional numbering resources in that state for violating our number reporting rules.[140] We seek comment on whether state commissions may, in some cases, be in the best position to determine whether providers are submitting accurate and complete NRUF reports because of their familiarity with the providers and circumstances in their state. If state commissions are granted authority to deny access to numbering resources in the first instance, should we create a specific process that would entail notice in writing by the state commission to the Commission, the NANPA, and the service provider setting forth the grounds for the denial, and allow the provider whose resources are withheld by state commission action to appeal that determination to the Bureau or the full Commission? Should state commissions have to meet a particular burden of proof or make certain showings prior to directing the NANPA to withhold numbering resources in the first instance? How should such decisions to withhold numbering resources be reversed, should the state commission find reason to do so?

65. We also seek comment generally on whether there are any other additional bases under which the Commission or state commissions should have the ability to direct the NANPA to withhold numbering resources. For example, should we adopt a rule providing that adjudicated violations directly related to the use and abuse of numbering resources, such as a violation of the Commission's "robocall blocking rules," will result in withholding of numbering resources?[141] What about other violations or reasons?

66. Should the Commission and, potentially, state commissions have the discretion to direct the NANPA to withhold numbering resources based on indicia of fraud or misuse of numbering resources that may fall short of a final Commission or state commission determination of a rule violation? For example, should the number of tracebacks over a certain period of time serve as grounds for directing the NANPA to withhold numbering resources? We note that the Commission declined to adopt a high number of tracebacks as a trigger for removal from the Robocall Mitigation Database, finding that it is "not always the case" that a high number of tracebacks is "evidence of malfeasance."[142] However, tracebacks or similar indicia of fraud may be more appropriate in the context of withholding numbering resources, particularly where the sanction may be temporary and it would not have the same effect as

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[138] 47 U.S.C. § 251(e)(1) (emphasis added).

[139] As discussed above, the NANPA has the authority to withhold additional numbering resources for failures to comply with NRUF reporting obligations. *See* 47 CFR § 52.15(g)(4)(iv).

[140] Currently, states only have a role in reviewing NANPA's decision to withhold numbering resources. *See id.* § 52.15(g)(5).

[141] *See Caller ID Authentication*, Sixth Report and Order, WC Docket No. 17-97, 38 FCC Rcd at 2601, para. 54 (setting per call maximum forfeiture amounts for the "robocall blocking rules," defined at 47 CFR § 64.1200 *et seq* and as 47 CFR § 64.6300 *et seq*).

[142] *Caller ID Authentication Sixth Report and Order*, 38 FCC Rcd at 2611, para. 74.

would a removal from the Robocall Mitigation Database.[143] We seek comment on that belief. Should receipt of a "Notification of Suspected Illegal Traffic" pursuant to 47 CFR § 64.1200(n)(2) be considered an adequate indicium of fraud for these purposes?[144] Are there any other indicia of fraud or number misuse that would be appropriate to serve as a trigger for withholding? Under what circumstances should the targeted entity be able to seek again new numbering resources if they are "cleared" of fraud or misuse? To what extent may suspected fraud be attributed to an entire operating company enterprise rather than merely the OCN drawing the numbering resources on which fraud is suspected? If it should be attributed to an entire enterprise, how would this be done? Should this apply at least at the legal-entity level—all OCNs held by the same legal entity are subject to attribution?

67. We seek suggestions for other means of removing administrative barriers to and delays in stopping numbering fraud and abuse. In addition, we seek comment on potential implementation timelines for the matters discussed above, as well as any alternatives that parties may suggest. Are there other matters for which we should consider granting state commissions broader authority in the context of numbering administration, to empower their efforts in combatting robocalls?

C. Other Changes to Numbering Administration Policy

68. Ultimately, bad actors cannot commence illegal robocall activities without access to numbering resources and the bar to obtain such resources may be too low. Are there other changes that we could make to safeguard against abuse of numbering resources for illegal robocall purposes, in light of the massive quantity of numbering resources used by robocallers and the need to promote efficient use of finite numbering resources? Are there any other current numbering rules that we should consider adopting or amending to aid the fight against robocalls?[145]

VI. COSTS AND BENEFITS

69. We seek comment on the costs and benefits associated with the various proposals and other potential actions described in this Notice. Robocalls impose a tremendous cost that could be meaningfully lowered by the proposals and many of the potential actions described in this notice. The Commission has previously found that widespread deployment of the STIR/SHAKEN framework will increase its effectiveness for both voice service providers and their subscribers, producing significant annual benefits due to the reduction in nuisance calls and fraud,[146] as well as many non-quantifiable benefits, such as restoring confidence in incoming calls[147] and ensuring reliable access to emergency and healthcare communications.[148] Consistent with the TRACED Act, the rules we propose here are intended to help unlock those benefits.

70. How will the benefits of these proposed rules affect the number of illegal robocalls that target consumers each year? Will these rules address some of the most harmful cases of robocalls? Will

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[143] *See, e.g.*, 47 CFR § 64.6305(g)(1) (stating that providers "shall accept calls from a domestic voice service provider only if that voice service provider's filing appears in the Robocall Mitigation Database"); *see also Caller ID Authentication Sixth Report and Order*, 38 FCC Rcd at 2604-05, paras. 62-63 (noting that the "expedited" RMD removal process is consistent with Fifth Amendment due process and the Administrative Procedure Act process for license revocations).

[144] *See* 47 CFR § 64.1200(n)(2).

[145] This is not a general request for suggested amendments to our numbering rules but, rather, suggestions for amendments that would aid the ability of the Commission, the NANPA, and state commissions to safeguard against abuse of numbering resources for illegal robocall purposes.

[146] *Caller ID Authentication First Report and Order*, 35 FCC Rcd at 3263, paras. 47-48.

[147] *Id.* at 3263-64, para. 49.

[148] *Id.* at 3264, para. 50.

these rules potentially allow law enforcement an easier way to track down abusive robocallers and recover victim funds? Are there data sources the Commission can use to track changes in robocall activity? Could the Commission use the number of unwanted call complaints filed with the Consumer Inquiries and Complaints Center as a proxy for the potential effect of the proposed rules? As the Commission has noted, an overall reduction in illegal robocalls will greatly lower network costs by eliminating both the unwanted traffic and the labor costs of handling numerous customer complaints. What is the expected benefit of these lower network costs?[149] What data sources can the Commission use to estimate the effect on traffic on the network from these proposed rule changes?

71. We also believe that the proposals and many of the potential actions described in this notice will aid in the conservation of numbering resources. Improving numbering resource conservation efforts is critical to delaying or potentially eliminating the need to incur future costs of improving the current numbering resources. We believe that more accurate data reporting will aid the Commission, state commissions, and the NANPA in managing numbering resources and aid the Commission in developing number resource conservation policy. Similarly, given the quantity of numbering resources consumed in number cycling, deterring or eliminating number cycling should also reduce demand for numbering resources. How should the Commission quantify the benefits of the potential improvement in delaying any need to expand the universe of numbering resources in the NANP?

72. With regard to potential costs, we believe that the certifications and disclosures we propose should place minimal burdens on service providers and resellers of telephone numbers.[150] We estimate one hour of labor for each new certification and disclosure; do providers agree with this estimate? If not, what is a more appropriate estimate for total hours of labor per certification? Staff estimate there are fewer than 2,400 providers that would be affected.[151] Do commentators agree with these estimates? We recognize that the incremental cost of the additional information to be collected as a result of our proposed changes to NRUF reporting to be greater on a per-service provider basis because they likely would require changes to internal systems, devoting resources to collecting information from resellers of telephone numbers, and potential changes to the NANPA contract to accommodate changes to the NANPA's NRUF reporting system. Staff estimates indicate the costs would likely be less than $560,000 cumulatively to providers. Do commentators agree that this is a reasonable estimate of potential costs of updating internal systems, and collecting the necessary information? If commentators disagree, what would be the expected costs to providers of making these changes? Potentially prohibiting number cycling does not appear to have meaningful cost, nor does empowering states to better implement our policies and rules. Are there any additional costs of the proposed rules that the Commission should consider?

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[149] *Id.* at 3264-65, para. 51.

[150] We estimate that the burden to providers to be less than $560,000. We arrive at this total by using $58 per hour multiplied by an estimated four hours of labor multiplied by 2,400 providers. Consistent with the Commission's calculations in Paperwork Reduction Act (PRA) statements, we estimate the median hourly wage for support staff (paralegals and legal assistants) as $40. To account for estimated benefits, we add 45% for a total hourly labor cost of $58. We arrive at four hours of labor by assuming the provider will need one hour for each major priority outlined in the certifications, and therefore it will take four hours to ensure they are in compliance with the: robocall-related certifications, other Commission rules for VoIP providers, relevant state laws, as well as tracking their foreign ownership information. According to the most recent Voice Telephone Services Report, there are approximately 1,900 providers reporting interconnected VoIP subscriptions. Therefore, even if every provider of interconnected VoIP service opted to obtain numbering resources directly and is required to submit a certification, the total costs would be approximately $440,800 (which is equal to 1,900 multiplied by $232). December 2024 Voice Telephone Services Report), at 10, Tbl. 2.

[151] There are 2,274 wireline voice providers and 53 mobile telephony providers with subscribers. Together this would indicate that less than 2,400 providers would be affected. *See id*.

73. Certain matters on which we seek comment, but do not make proposals, may have higher costs, such as potential means of improving available data relating to resale beyond modifications to NRUF reporting. Further, limiting resale to a single level has the potential to reduce resale-based competition to a certain degree. Do commenters agree that the benefits of reducing illegal robocalls could still outweigh such potential costs?

VII. LEGAL AUTHORITY

74. We tentatively conclude that section 251(e)(1) of the Act, which grants us "exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States," provides us with authority to adopt our proposals and potentially take action on the vast majority of matters on which we seek comment.[152] We seek comment on this conclusion.

75. We intend to rely on the same section 251(e)(1) authority on which we relied in the *Second VoIP Direct Access Report and Order* and *Third VoIP Direct Access Report and Order* to initially create and expand the application of robocall certification obligations for our proposed extension of the robocall certification obligations to all direct recipients of numbering resources.[153] The Commission's general NRUF reporting requirements were established in the *Numbering Resource Optimization First Report and Order* pursuant to section 251(e)(1),[154] and the proposed changes to the substance of the NRUF rules, as well changes to how state commissions may access such data, would be a continuing exercise of this authority. Section 251(e)(1) similarly gives us authority to apply both of these sets of requirements to resellers of telephone numbers in their role as service providers that use numbering resources. Further, section 251(e)(1) explicitly states that nothing in the subsection "preclude[s] the Commission from delegating to State commissions or other entities all or any portion of such jurisdiction."[155] We propose to rely on this authority for the expansion of state commissions' authority regarding enforcing our numbering rules.

76. We also tentatively conclude that section 6(a) of the TRACED Act provides us with separate, additional authority to adopt our proposals related to fighting illegal robocalls. Section 6(a)(1) directed the Commission "to commence a proceeding to determine how Commission policies regarding access to number resources . . . could be modified, including by establishing registration and compliance obligations," and to "take sufficient steps to know the identity of the customers of such providers [of voice services], to help reduce access to numbers by potential perpetrators of violations of section 227(b) of the Communications Act of 1934 (47 U.S.C. 227(b))."[156]

77. The Commission commenced the required proceeding pursuant to the TRACED Act in March 2020.[157] This Notice serves an extension of that inquiry. Section 6(a)(2) of the TRACED Act states that "[i]f the Commission determines under paragraph (1) that modifying the policies described in that paragraph could help achieve the goal described in that paragraph, the Commission shall prescribe regulations to implement those policy modifications."[158] Because the proposals in this Notice and potential actions on which we seek comment seek to reduce access to numbers by potential perpetrators of

[152] 47 U.S.C. § 251(e)(1). The potential exception to this is limiting resale to a single level, which we discuss below.

[153] *See Second VoIP Direct Access Report and Order and Further Notice*, 38 FCC Rcd at 8995, para. 93; *Third VoIP Direct Access Report and Order*, FCC 25-86 at 13-14, paras. 24-25.

[154] *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7576, 7576-77, paras. 1, 5.

[155] 47 U.S.C. § 251(e)(1).

[156] TRACED Act § 6(a)(1); 47 U.S.C. § 227b-1(a)(1); *see also* 47 U.S.C. § 227(b) (restricting the making of calls using an automatic telephone dialing system or an artificial or prerecorded voice message).

[157] *Caller ID Authentication First Report and Order*, 35 FCC Rcd at 3292-96, paras. 123-30.

[158] TRACED Act § 6(a)(2), 47 U.S.C. § 227b-1(a)(2).

illegal robocalls, section 6(a) of the TRACED Act provides an independent basis for the potential rule changes. This includes potentially limiting resale of numbering resources to a single level.

78. We seek comment on these tentative conclusions. We further invite commenters to suggest other potential supplemental or independent sources of authority for any rule changes that we may make in this proceeding.

VIII. PROCEDURAL MATTERS

79. *Filing Requirements*. Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: https://www.fcc.gov/ecfs.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. All filings must be addressed to the Secretary, Federal Communications Commission.
  - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD, 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

80. *People with Disabilities*: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice).

81. *Ex Parte Rules*. This proceeding shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.[159] Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must: (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made; and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda, or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with section 1.1206(b) of the Commission's rules. In proceedings governed by section 1.49(f) of the rules or for which the Commission has made available a method of electronic filing, written *ex*

[159] *See* 47 CFR §§ 1.1200 *et seq*.

parte presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must, when feasible, be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml., .ppt, searchable .pdf).[160] Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

82. *Regulatory Flexibility Act*. The Regulatory Flexibility Act of 1980, as amended (RFA),[161] requires that an agency prepare a regulatory flexibility analysis for notice-and-comment rulemaking proceedings, unless the agency certifies that "the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."[162] Accordingly, the Commission has prepared an Initial Regulatory Flexibility Analysis (IRFA), concerning potential rule and policy changes contained in this Notice. The IRFA is set forth in Appendix B. The Commission invites the general public, in particular small businesses, to comment on the IRFA. Comments must be filed by the deadlines for comments on the Notice indicated on the first page of this document, and must also have a separate and distinct heading designating them as responses to the IRFA.

83. *Paperwork Reduction Act Analysis*. This document may contain proposed new or modified information collections. The Commission, as part of its continuing effort to reduce paperwork burdens, invites the general public and the Office of Management and Budget to comment on any information collections contained in this document, as required by the Paperwork Reduction Act of 1995.[163] In addition, pursuant to the Small Business Paperwork Relief Act of 2002, we seek specific comment on how we might further reduce the information collection burden for small business concerns with fewer than 25 employees.[164]

84. *Providing Accountability Through Transparency Act.* Consistent with the Providing Accountability Through Transparency Act, Public Law 118-9, a summary of this Fourth Notice of Proposed Rulemaking will be available on https://www.fcc.gov/proposed-rulemakings.

85. *Further Information*. For further information about this proceeding, please contact Raphael Sznajder or Ed Krachmer, FCC Wireline Competition Bureau, Competition Policy Division at Raphael.Sznajder@fcc.gov or Edward.Krachmer@fcc.gov.

IX. ORDERING CLAUSES

86. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, 4(i), (4)(j), 227b-1(a), and 251(e) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 227b-1(a), and 251(e), this Notice of Proposed Rulemaking IS ADOPTED.[165]

87. IT IS FURTHER ORDERED that, pursuant to applicable procedures set forth in sections 1.415 and 1.419 of the Commission's Rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments on the Notice of Proposed Rulemaking on or before 30 days after publication in the Federal Register, and reply comments on or before 60 days after publication in the Federal Register.

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[160] *Id*. § 1.1206(b)(2)(i).

[161] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[162] *Id.* § 605(b).

[163] 44 U.S.C. §§ 3501-3521.

[164] *Id.* § 3506(c)(4).

[165] Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 20, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 68708 (Dec. 28, 1993).

88. IT IS FURTHER ORDERED that the Commission's Office of the Secretary, SHALL SEND a copy of this Notice of Proposed Rulemaking, including the Initial Regulatory Flexibility Analysis, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

APPENDIX A

PROPOSED RULES

PART 52 – NUMBERING

1. The authority citation for part 52 continues to read as follows:

Authority: 47 U.S.C. 151, 152, 153, 154, 155, 201-205, 207-209, 218, 225-227, 227b-1, 251-252, 271, 303, 332, unless otherwise noted.

Subpart B –Administration

2. Section 52.15 is amended to read as follows:

§ 52.15 Central office code administration.

* * * * *

(f) *Mandatory reporting requirements* —

(1) *Number use categories*. Numbering resources must be classified in one of the following categories and subcategories, for which the reporting provider bears the burden of determining status and designating appropriate categorization and subcategorization:

(i) * * *

(ii) * * *

(iii) * * *

(iv) * * *

(v) *Intermediate numbers* are numbers that are made available for use by another telecommunications carrier or non-carrier entity (for purposes of this subparagraph (f), a reseller) for the purpose of providing telecommunications service, or any other service using telephone numbers, to an end user or customer. Numbers ported for the purpose of transferring an established customer's service to another service provider shall not be classified as intermediate numbers. *Intermediate numbers* must be further classified in one of the following subcategories:

(A) *Intermediate assigned numbers* are numbers that are *intermediate* and, from the perspective of the reseller, *assigned numbers.*

(B) *Intermediate other numbers* are numbers that are *intermediate* and, from the perspective of the reseller, either *administrative numbers*, *aging numbers*, *intermediate numbers used for further resale*, or *reserved numbers*. *Intermediate numbers used for further resale* are numbers that are made available for use by another reseller.

(C) *Intermediate available numbers* are numbers that are *intermediate* and, from the perspective of the reseller, are *available numbers*.

(vi) * * *

(2) * * *

(3) *Data collection procedures*.

(i) * * *

(ii) * * *

(iii) All data shall be filed electronically in a format approved by the Wireline Competition Bureau.

(4) * * *

(5) *Utilization data reporting*.

(i) Reporting carriers shall submit to the NANPA a utilization report of their current inventory of numbering resources. The report shall classify numbering resources in the following number use categories: *assigned*, *intermediate* (specified as either *intermediate assigned* or *intermediate other)*, *reserved*, *aging*, and *administrative*. Further, reporting carriers shall identify the resellers of their telephone numbering resources by legal name and by an identification code or codes specified by the Wireline Competition Bureau.

(ii) * * *

(iii) * * *

(6) *Reporting frequency*.

(i) Reporting carriers shall file forecast and utilization reports semi-annually on or before February 1 for the preceding reporting period ending on December 31, and on or before August 1 for the preceding reporting period ending on June 30.

(ii) State commissions may reduce the reporting frequency for NPAs in their states to annual. Reporting carriers operating in such NPAs shall file forecast and utilization reports annually on or before August 1 for the preceding reporting period ending on June 30.

(iii) * * *

(7) * * *

(8) * * *

(g) * * *

(1) * * *

(2) *Initial numbering resources*. An applicant for initial numbering resources must include in its application: (i) evidence that the applicant is authorized to provide service in the area for which the numbering resources are requested; (ii) evidence that the applicant is or will be capable of providing service within sixty (60) days of the numbering resources activation date; and (iii) a copy of its filing

made pursuant to paragraph (l) of this section. A provider of VoIP Positioning Center (VPC) services that is unable to demonstrate authorization to provide service in a state may instead demonstrate that the state does not certify VPC service providers in order to request pseudo-Automatic Numbering Identification (p-ANI) codes directly from the Numbering Administrators for purposes of providing 911 and E-911 service.

(3) * * *

(i) * * *

(ii) * * *

(A) * * *

(B) * * *

(C) * * *

(D) * * *

(E) * * *

(F) * * *

(G) * * *

(H) * * *

(I) * * *

(J) * * *

(K) * * *

(L) * * *

(M) * * *

(N) A certification that the applicant has fully complied, as applicable, with its obligations under §§ 1.80003(a), (j) and (l), 22.5, and 24.404(b) (and if not applicable, explicitly state so);

(O) A declaration under penalty of perjury pursuant to § 1.16 of this chapter that all statements in the application and any appendices are true and accurate. This declaration shall be executed by an officer or other authorized representative of the applicant.

(iii) * * *

(iv) * * *

(v) * * *

(vi) * * *

(vii) * * *

(viii) * * *

(ix) * * *

(x) * * *

(4) * * *

(5) * * *

(6) * * *

(h) *National utilization threshold*. All applicants for growth numbering resources shall achieve a 75% utilization threshold, calculated in accordance with paragraph (g)(4)(ii) of this section, for the rate center in which they are requesting growth numbering resources.

(i) * * *

(j) * * *

(k) * * *

(1) * * *

(2) * * *

(3) Requests for "for cause" audits shall be forwarded to the Chief of the Enforcement Bureau, with a copy to the Chief of the Wireline Competition Bureau. Requests must state the reason for which a "for cause" audit is being requested and include documentation of the alleged anomaly, inconsistency, or violation of the Commission rules or orders or applicable industry guidelines. The Chief of the Enforcement Bureau will provide carriers up to 30 days to provide a written response to a request for a "for cause" audit.

(l) *Certification obligations applicable to carriers other than those authorized pursuant to paragraph (g)(3) of this section, and to resellers*.

(1) This subparagraph applies to the following:

(A) Carriers, other than those authorized pursuant to paragraph (g)(3) of this section, holding or seeking to hold geographic numbering resources that were, or will be, obtained directly from the NANPA/PA other than p-ANI (for the purposes of this subparagraph, covered carriers);

(B) Telecommunications carriers seeking to resell services that include the provisioning of geographic numbering resources other than p-ANI (for the purposes of this subparagraph, resellers).

(2) Each covered carrier and reseller must file the following:

(A) A certification that the covered carrier or reseller will not use numbers that it obtains to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 through 64.6308 of this chapter and 16 CFR 310.3(b);

(B) A certification that the applicant has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 through 64.6305 of this chapter;

(C) A certification that the applicant has fully complied with its obligations under §§ 1.80003(a), (j), and (l), 22.5, 24.404(b), 63.18(h) and (i), and 90.115 (as applicable to the applicant);

(D) A declaration under penalty of perjury pursuant to § 1.16 of this chapter that each certification is true and accurate. This declaration shall be executed by an officer or other authorized representative of the applicant.

(3) Covered carriers not yet holding geographic numbering resources obtained directly from the NANPA other than p-ANI must make the filings required by paragraph (l)(2) no fewer than 30 days prior to its first initial application for numbering resources pursuant to subparagraph (g)(2).

(4) Resellers that are not yet reselling services that include geographic numbering resources other than p-ANI must make the filings required by paragraph (l)(2) no fewer than 30 days prior to beginning to resell such service.

Subpart C –Number Portability

3. Add new § 52.38 to read as follows:

§ 52.38 Reporting of Resale Relationships in Number Portability Databases.

Telecommunications carriers creating or maintaining records in the regional SMS databases for the provision of long-term database methods for number portability described in § 52.25 shall populate all pertinent fields relating to resellers of their service.

APPENDIX B

INITIAL REGULATORY FLEXIBILITY ANALYSIS

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[1] the Federal Communications Commission (Commission) has prepared this Initial Regulatory Flexibility Analysis (IRFA) of the policies and rules proposed in the *Notice of Proposed Rulemaking* (*Notice*) assessing the possible significant economic impact on a substantial number of small entities. The Commission requests written public comments on this IRFA. Comments must be identified as responses to the IRFA and must be filed by the deadlines for comments specified on the first page of the *Notice*. The Commission will send a copy of the *Notice*, including this IRFA, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.[2] In addition, the *Notice* and IRFA (or summaries thereof) will be published in the Federal Register.[3]

A. Need for, and Objectives of, the Proposed Rules

2. Combatting illegal robocalls remains paramount among the Commission's consumer protection priorities. As part of its multi-pronged effort to combat the tide of illegal robocalls, the Commission initiates this proceeding to evaluate whether to adopt changes to its numbering policy, particularly in how already-assigned numbers are used by service providers to further combat illegal robocalls. Although wireline, wireless, and interconnected Voice over Internet Protocol (VoIP) service providers may receive numbering resources directly from the North American Numbering Plan Administrator (NANPA), the robocall ecosystem is broader because it also includes multiple levels of resellers that indirectly access numbering resources. In the *Notice*, the Commission explores and proposes a broad array of solutions to strengthen the Commission's numbering requirements and policies, especially as they relate to numbering resource resellers as some of the most extensive illegal robocalling schemes often involve such resellers.

B. Legal Basis

3. The proposed action is authorized pursuant to sections 1, 2, 4(i), (4)(j), 227b-1(a), and 251(e) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 227b-1(a), and 251(e).

C. Description and Estimate of the Number of Small Entities to Which the Proposed Rules Will Apply

4. The RFA directs agencies to provide a description of and, where feasible, an estimate of the number of small entities that may be affected by the proposed rules, if adopted.[4] The RFA generally defines the term "small entity" as having the same meaning as the terms "small business," "small organization," and "small governmental jurisdiction."[5] In addition, the term "small business" has the same meaning as the term "small business concern" under the Small Business Act (SBA).[6] A "small

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[1] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[2] *Id*. § 603(a).

[3] *Id.*

[4] 5 U.S.C. § 603(b)(3).

[5] *Id*. § 601(6).

[6] *Id*. § 601(3) (incorporating by reference the definition of "small-business concern" in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies "unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public

(continued….)

business concern" is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.[7] The SBA establishes small business size standards that agencies are required to use when promulgating regulations relating to small businesses; agencies may establish alternative size standards for use in such programs, but must consult and obtain approval from SBA before doing so.[8]

5. Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.[9] In general, a small business is an independent business having fewer than 500 employees.[10] These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.[11] Next, "small organizations" are not-for-profit enterprises that are independently owned and operated and not dominant in their field.[12] While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.[13] Finally, "small governmental jurisdictions" are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.[14] Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local government jurisdictions have a population of less than 50,000.[15]

6. The rules proposed in the *Notice* will apply to small entities in the industries identified in the chart below by their six-digit North American Industry Classification System (NAICS)[16] codes and corresponding SBA size standard.[17] Based on currently available U.S. Census data regarding the estimated number of small firms in each identified industry, we conclude that the proposed rules will impact a substantial number of small entities. Where available, we also provide additional information regarding the number of potentially affected entities in the industries identified below.

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comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register."

[7] 15 U.S.C. § 632.

[8] 13 CFR § 121.903.

[9] 5 U.S.C. § 601(3)-(6).

[10] *See* SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

[11] *Id*.

[12] 5 U.S.C. § 601(4).

[13] *See* SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 2019), https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/.

[14] 5 U.S.C. § 601(5).

[15] *See* U.S. Census Bureau, 2022 Census of Governments –Organization, https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html, tables 1-11.

[16] The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. *See* www.census.gov/NAICS for further details regarding the NAICS codes identified in this chart.

[17] The size standards in this chart are set forth in 13 CFR § 121.201, by six-digit North American Industrial Classification System (NAICS) code.

Table 1. 2022 U.S. Census Bureau Data by NAICS Code

Regulated Industry (Footnotes specify potentially affected entities within a regulated industry where applicable)	NAICS Code	SBA Size Standard	Total Firms[18]	Total Small Firms[19]	% Small Firms
Wired Telecommunications Carriers[20]	517111	1,500 employees	3,403	3,027	88.95%
Wireless Telecommunications Carriers (except Satellite)[21]	517112	1,500 employees	1,184	1,081	91.30%
Telecommunications Resellers[22]	517121	1,500 employees	955	847	88.69%
Satellite Telecommunications	517410	$44 million	332	195	58.73%
All Other Telecommunications	517810	$40 million	1,673	1,007	60.19%

Table 2. Telecommunications Service Provider Data

2024 Universal Service Monitoring Report Telecommunications Service Provider Data[23] (Data as of December 2023)	SBA Size Standard (1500 Employees)		
Affected Entity	**Total # FCC Form 499A Filers**	**Small Firms**	**% Small Entities**
Competitive Local Exchange Carriers (CLECs)[24]	3,729	3,576	95.90%
Incumbent Local Exchange Carriers (Incumbent LECs)	1,175	917	78.04%
Interexchange Carriers (IXCs)	113	95	84.07%
Local Exchange Carriers (LECs)[25]	4,904	4,493	91.62%
Local Resellers	222	217	97.75%
Other Toll Carriers	74	71	95.95%
Paging & Messaging	59	59	100.00%
Prepaid Card Providers	47	47	100.00%
Toll Resellers	411	398	96.84%
Telecommunications Resellers	633	615	97.16%

[18] U.S. Census Bureau, *Selected Sectors: Employment Size of Firms for the U.S.: 2022*. Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEEMPFIRM, 2025; *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2022*. Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEREVFIRM, 2025.

[19] *Id.*

[20] Affected Entities in this industry Competitive Local Exchange Carriers (CLECs), Competitive Local Service Providers, Incumbent Local Exchange Carriers (Incumbent LECs), Interexchange Carriers (IXCs), Local Exchange Carriers (LECs), and Other Toll Carriers.

[21] Affected Entities in this industry include Cellular Radiotelephone Service, Paging Services, Wireless Carriers and Service Providers, Wireless Communications Services, and Wireless Telephony.

[22] Affected Entities in this industry include Local Resellers, Prepaid Calling Card Providers, Toll Resellers, and Wireless Resellers.

[23] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[24] Affected Entities in this industry include all reporting local competitive service providers.

[25] Affected Entities in this industry include all reporting fixed local service providers (CLECs and ILECs).

2024 Universal Service Monitoring Report Telecommunications Service Provider Data[23] (Data as of December 2023)	SBA Size Standard (1500 Employees)		
Affected Entity	**Total # FCC Form 499A Filers**	**Small Firms**	**% Small Entities**
Wired Telecommunications Carriers[26]	4,682	4,276	91.33%
Wireless Telecommunications Carriers (except Satellite)[27]	585	498	85.13%
Wireless Telephony[28]	326	247	75.77%

D. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

7. The RFA directs agencies to describe the economic impact of proposed rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an estimate of the classes of small entities which will be subject to the requirements and the type of professional skills necessary for preparation of the report or record.[29]

8. In the *Notice,* we propose to further extend the robocall certification requirements applicable to interconnected VoIP providers seeking direct access to numbering resources to *all* providers receiving numbering resources directly from the NANPA, including local exchange carriers and commercial mobile service providers, and also to all service providers that resell service that includes the provisioning of one or more telephone numbers. This would include interconnected VoIP providers that do not receive numbering resources through direct access, but through resale. We propose that all service providers impacted by these changes would be required to comply within 30 days of the effective date of the rules. Service providers intending to obtain numbering resources for the first time from the NANPA, as well as resellers intending to become operational, would be required to comply at least 30 days prior to submitting their first request for numbering resources to the NANPA or beginning to resell service. We seek comment on whether these compliance dates should be extended for small entities.

9. In addition, we propose modifications to the number utilization/forecast (NRUF) reporting requirements in the numbering resource utilization/forecast form to obtain more granular information regarding utilization, better detect irregularities, aid robocall enforcement efforts, and inform numbering policy development. We also propose that any changes or clarifications would apply to the first NRUF reporting period starting at least 12 months after the effective date of the order promulgating these rules, and seek comment on whether to establish a later deadline for small entities.

10. In the *Notice,* the Commission seeks comment on a number of matters in addition to the proposals such as restricting numbering resale to a single level, how our numbering policy can and should address robocallers that rely on number "cycling"—going through large quantities of telephone numbers on a rotating basis or even just one time; new ways in which the Commission, with assistance from the states and the NANPA, can better identify fraudulent use and misuse of telephone numbers; and other changes that could safeguard against abuse of massive quantities of numbering resources to promote efficient use of finite numbering resources and to further deter robocalling.

[26] Local Resellers fall into another U.S. Census Bureau industry (Telecommunications Resellers) and therefore data for these providers is not included in this industry.

[27] Affected Entities in this industry include all reporting wireless carriers and service providers.

[28] Affected Entities in this industry include Cellular/PCS/SMR - Specialized Mobile Radio Licensees and SMR (Dispatch).

[29] 5 U.S.C. § 603(b)(4).

11. These proposals and matters on which we seek comment, if adopted, may create new or additional reporting or recordkeeping and/or other compliance obligations on small entities, if adopted. We estimate that the cost to small and other providers would be less than $560,000.[30] We anticipate the information we receive in comments including, where requested, cost and benefit analyses, will help the Commission further identify and evaluate relevant compliance matters for small entities, including additional compliance costs such as whether small entities will have to hire professionals, and other burdens that may result from the inquiries we make in the *Notice*.

E. Discussion of Significant Alternatives Considered That Minimize the Significant Economic Impact on Small Entities

12. The RFA directs agencies to provide a description of any significant alternatives to the proposed rules that would accomplish the stated objectives of applicable statutes, and minimize any significant economic impact on small entities.[31] The discussion is required to include alternatives such as: "(1) the establishment of differing compliance or reporting requirements or timetables that take into account the resources available to small entities; (2) the clarification, consolidation, or simplification of compliance and reporting requirements under the rule for such small entities; (3) the use of performance rather than design standards; and (4) an exemption from coverage of the rule, or any part thereof, for such small entities."[32]

13. The *Notice* seeks comment on a number of alternatives that may minimize the impact of the proposed rules on small entities. For example, we seek comment on whether to limit certain obligations to service providers that obtain numbering resources directly from the NANPA, as opposed to also including resellers. The Commission does not believe that there will be a significant economic impact on small entities if its proposals were to be adopted but nevertheless seeks comment on whether it should establish a later implementation deadline for small entities and, if so, what it should be and how we should define small entities for such purposes. With respect to matters on which the Commission does not propose action but discusses implementation process, the Commission similarly seeks comment on potential later implementation deadline for small entities.

14. In evaluating the proposals in the *Notice*, the Commission will fully consider the economic impact on small entities as it evaluates the comments filed, including comments related to costs and benefits. Alternative proposals and approaches from commenters will further develop the record and could help the Commission further minimize the economic impact on small entities. The Commission's evaluation of the comments filed in this proceeding will shape the final conclusions it reaches, the final alternatives it considers, and the actions it ultimately takes to minimize any significant economic impact that may occur on small entities from the final rules.

F. Federal Rules that May Duplicate, Overlap, or Conflict with the Proposed Rules

15. None.

[30] *Notice* Section VI.

[31] 5 U.S.C. § 603(c).

[32] *Id.* § 603(c)(1)-(4).