

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544**

<i>In the Matter of:</i>)	
<i>Interconnected VoIP Numbering</i>)	
<i>Authorization Application Filed</i>)	WC Docket No. 19-99
<i>by NumberBarn, LLC</i>)	
<i>Pursuant to Section 52.15(g)(3)</i>)	
<i>of the Commission's Rules</i>)	

**MOTION OF THE NATIONAL ASSOCIATION OF REGULATORY
UTILITY COMMISSIONERS FOR EXTENSION OF TIME AND TO
REMOVE THIS APPLICATION FROM A STREAMLINED PLEADING
CYCLE.**

Pursuant to Rule 1.46 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. § 1.46 (2007), the National Association of Regulatory Utility Commissioners (NARUC), on behalf of several of its' member commissions, respectfully files this motion requesting an extension of the comment cycle for the September 24, 2024 Public Notice DA 24-984 captioned *Interconnected VoIP Numbering Authorization Application Filed by NumberBarn, LLC Pursuant to Section 52.15(g)(3) of the Commission's Rules* ("Notice"), available online at: <https://docs.fcc.gov/public/attachments/DA-24-984A1.docx>. The Notice sets October 9, 2024 for comments under a streamlined pleading cycle. NARUC requests the FCC extend the time for all comments by 30

days to November 9, 2024 and to remove the request from the streamlined pleading cycle and/or notify Numberbarn that the “grant will not be automatically effective.”¹

In support of this request, NARUC states as follows:

NARUC is a quasi-governmental nonprofit organization founded in 1889. NARUC’s members include those governmental bodies of the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands, which engage in the regulation of carriers and utilities. NARUC’s member state public service commissioners are charged with the duty of regulating the telecommunications common carriers within their respective borders. They have always played a key role in the conservation of the numbering resources of the North American Numbering Plan. Indeed, in September of 1991, NARUC set the stage for the creation of the North American Numbering Council by petitioning the Commission to begin a broad inquiry into administration of the North American Numbering Plan.² When the FCC established the procedures in 2015 to permit the direct access to numbering resources NumberBarn is utilizing in this notice, the FCC was also careful to provide “an

¹ 47 C.F.R. § 52.15(g)(3)(iv) (“An application under this section is deemed granted by the Commission on the 31st day after the Commission releases a public notice stating that the application has been accepted for filing, unless the Bureau notifies the applicant that the grant will not be automatically effective.”)

² *In the Matter of Administration of the North American Numbering Plan*, 11 F.C.C. Rcd. 2588, 2592 n. 9 (1995)

opportunity for states to offer their unique perspective regarding numbering resources within their states.”³

Numberbarn’s application raises novel issues not associated with a typical application for direct access to numbers. Either NumberBarn, LLC or a close affiliate appears to sell phone numbers. The main “NumberBarn” website, captioned “Supercharge Your Phone Number”, notes it has a “Marketplace of 75,249,796 available local and toll free numbers” and includes a “get a number link” to “find a custom and memorable local or toll free phone number,” at <https://www.numberbarn.com/> (last accessed September 25, 2024). See also, “NumberBarn Find and buy your new custom phone number”, at <https://www.numberbarn.com/search?type=local&state=TX&moreResults=true&sort=price-> (last accessed September 25, 2024).

Discussions about novel number uses that threaten to significantly accelerate the exhaust of the NANP have been a focus of the recently reconstituted NARUC Staff Subcommittee Numbering Workgroup. On Wednesday, during a meeting of that Workgroup, a number of NARUC member commissions indicated they would like the opportunity to comment on this application. However, State approval procedures make it difficult for them to create a draft and get it through the necessary

³ *In the Matter of Numbering Policies for Modern Communications*, Report and Order, 30 F.C.C. Rcd. 6839, 6849 (2015)

approvals to file in less than two weeks. Those States asked that NARUC file this request for the FCC to extend by 30 days the comment deadline and to simultaneously remove the application from streamlined review and/or notify Numberbarn that the “grant will not be automatically effective.”

Because this application raises novel issues, and states typically need more than two weeks to get comments through the approval process, NARUC respectfully requests the FCC (i) grant the requested 30 day extension of the comment deadline, (ii) remove this application from streamlined review and (iii) notify NumberBarn that the “grant will not be automatically effective.”

Respectfully Submitted,

James Bradford Ramsay

GENERAL COUNSEL

Robert Cain

ASSISTANT GENERAL COUNSEL

**National Association of Regulatory Utility
Commissioners**

1101 Vermont Avenue, Suite 401

Washington, D.C. 20005

202.257.0568 [jramsay@naruc.org]

September 26, 2025

cc: DAA@fcc.gov

Margoux Newman [via Margoux.Newman@fcc.gov]

Attorney, Competition Policy Division, FCC Wireline Competition Bureau

Jordan Marie Reth [via Jordan.Reth@fcc.gov]

Attorney, Competition Policy Division, FCC Wireline Competition Bureau

Allison D. Rule [via adr@commlawgroup.com]

Marashlian & Donahue, DC Counsel for Numberbarn

Matthew Veling [via mveling@numberbarn.com]

NumberBarn, Personnel qualified to address regulatory/Compliance issues