



**N A R U C**  
National Association of Regulatory Utility Commissioners

**September 1, 2025**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, D.C. 20544

**RE: Notice of Oral (and written) Ex Partes filed in the proceedings captioned:**

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

***In the Matter of Eliminating Ex Ante Pricing Regulation and Tariffing of Telephone Access Charges, WC Docket No. 20-71***

**Dear Secretary Dortch,**

On Wednesday, August 27, 2025, the undersigned had three meetings at the Federal Communications Commission. I met separately with [1] **Marcus Maher, Senior Legal Advisor to Commission Trusty**; (2) **Joseph Calascione, Chief, FCC Wireline Competition Bureau**, and [3] **Cara Voth, Deputy Bureau Chief, Wireline Competition Bureau, Jodie May, Division Chief, Competition Policy Division, Wireline Competition Bureau**, and **Ed Krachmer, Deputy Chief Competition Policy Division, Wireline Competition Bureau**.

With Mr. Maher and Mr. Calascione I discussed both listed dockets. With Ms. Voth, Ms. May and Mr. Krachmer, I only discussed numbering issues. As a result of the discussions – I added some additional information about the NumberBarn July 2025 Ex Parte.

## ***Discussion of NumberBarn and Numbering issues raised in WC Docket No. 19-99***

A few things are obvious. The expansion (and inherent obfuscation) of the primary, secondary and tertiary wholesale numbers markets reduces transparency about use -- and both undermines conservation efforts and facilitates robocalling. Wholesalers of telephone numbers are knowingly or unknowingly assisting companies that engage in number rotation schemes by selling large quantities of numbers to providers that may or may not have direct access to numbering resources in their own right.

### **SALES?           NON-TOLL FREE NUMBERS**

During the meeting, NumberBarn's most recent *ex parte*<sup>1</sup> was discussed. NARUC suggested NumberBarn was selling non-toll free numbers in violation of industry guidelines. Currently, VoIP applicants for direct access to numbering resources must state that they will abide by industry guidelines. 47 C.F.R. § 52.15(g)(3)(ii)(B). There is no valid policy argument for exempting NumberBarn from this requirement.

During the discussion, it was suggested that in their July 2025 *ex parte*, NumberBarn had explained they always offer a service with the sale of a phone number – so they are not selling the number but a service. But that's not the case- or at least – its certainly not what NumberBarn claims on its website.

A simple Google search (on August 28, 2025) brought up this hyperlinked text to a page on NumberBarn's website: [Buy a Phone Number and Port it Away](#)

If you click on the blue hyperlinked text – it will take you to <https://www.numberbarn.com/purchase-and-port> - a page NumberBarn captions: **“Take it with you – Purchase a number and port it away to your carrier”** On the page, among other things, it says:

*“Through our relationship with multiple carriers and vendors, NumberBarn has created the world's largest marketplace for local and toll free phone numbers. We've done the hard work of navigating the carrier networks on the backend so you can find your custom number from one simple search. Don't settle for a random phone number from your service provider.”*

Sure looks like they are - on at least this page - selling just the number. The only “related service” is porting it to the provider of the customer's choice – aka delivering the sold product.

### **SERVICE?           PURCHASE-AND-PORT**

We also discussed what service NumberBarn provides. The charts attached to the July *ex parte* on Voice Services, and NumberGarage, suggests that NumberBarn does not generally offer two way calling voice service, though its affiliate Number Garage offers some voice services to small businesses.

Instead Numberbarn offers – in addition to the above service Numberbarn references as “purchase-and-port” – parking phone numbers for a fee and providing phone numbers with limited functionality that can be used to forward service to another phone number.

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<sup>1</sup> See July 1, 2025 *Ex Parte Presentation of NumberBarn, LLC, Application for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules*, WC Docket No. 19-19, online at <https://www.fcc.gov/ecfs/search/search-filings/filing/10703235999397>.

## **SALES? TOLL FREE NUMBERS**

Also it appears from the July *ex parte*, that NumberBarn also sells toll-free numbers, a practice prohibited by 47 C.F.R. § 52.105 and 52.107. The *ex parte* includes slides showing NumberBarn's prices for toll-free numbers as listed on NumberBarn's website as well as prices listed by other providers.

## **OTHER ISSUES? COMPLIANCE WITH FCC ORDERS**

I also mentioned during the discussion that it is not clear NumberBarn is in compliance with state-specific obligations required by the FCC in the *VoIP Direct Access Second Report and Order*.<sup>2</sup> Specifically, the November 9, 2024 Joint State Comments<sup>3</sup> noted NumberBarn does not have a business license to operate in the District of Columbia.

**NARUC has passed two specific resolutions relevant to the NumberBarn petition for direct access to numbers. Both are attached to this *ex parte*.<sup>4</sup> NARUC and various other State Commission authored comments are clear: The FCC should instigate an audit and investigation of NumberBarn (and other wholesaler's) practices. Until that is complete, the FCC should not give NumberBarn – who, as noted above has violated both the spirit and letter of the FCC's regulations – direct access.**

## **SOME ADDITIONAL BACKGROUND**

The first NARUC resolution, which passed in February of 2024, noted that several state commissions reported that many telecommunications carriers (including VoIP providers) fail to fulfill basic reporting requirements, over-inflate the forecasted need for telephone numbers, and use blocks of thousands of numbers inefficiently, contaminating them for future use by another carrier. It also pointed out that some carriers are facilitating illegal robocalling and circumventing FCC rules by renting finite telephone numbering resources to wholesale telecommunications customers who are often located outside of the United States. That resolution noted – correctly - that there “has not been an audit of a telecommunications carrier or VoIP service providers in at least a decade.” It specifically urged the FCC to provide updated guidance on how states should bring forward cases of number resource mismanagement or suspected robocalling using rented telephone numbers to the Commission using the audit process outlined in 47 CFR 52.15(k).

The second resolution, which passed in November of 2024, noted that several NARUC member Commissions have reported that some telecommunications carriers (including VoIP providers), appear to

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<sup>2</sup> See 47 CFR § 52.15(g)(3)(ii)(B). *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, FCC 23-75, ¶ 45 (rel. September 22, 2023).

<sup>3</sup> *Comments of the [State Commissions] Regarding the Interconnected VoIP Numbering Authorization Application Filed by Numberbarn, LLC Pursuant to Section 52.15(G)(3) of the Commission's Rules*, WC Docket No. 19-99, filed November 8, 2024, online at: <https://www.fcc.gov/ecfs/document/1107056348833/1>.

<sup>4</sup> Along with another one that passed at NARUC's July Summer Meeting – urging the FCC “to develop a formal mechanism, beyond filing a petition, comments, and *ex partes* in ongoing proceedings, to identify and act upon NARUC and state commission proposals on telephone numbering issues.”

be transferring telephone numbers to companies that warehouse these numbers or engage in their sale or licensing.

This is not a new issue.

The NANC asked the Alliance for Telecommunications Industry Solutions Industry Numbering Committee to investigate the brokering of geographic telephone numbers as long ago as September 30, 2015, following credible reports of numbers being sold; (INC Guidelines relating to such transactions apply to service providers, not individual users.<sup>5</sup>). Then, on February 28, 2023, the NANC approved the ITN Report recommending, among other things, further detailed study on the brokering of geographic numbers, and a review of industry guidelines and policies be performed to determine the impact of these processes on number resource utilization and the need for clarification/modification of numbering rules.

The needed FCC broad investigation (and audits) – long overdue - have yet to occur.

Before taking any action on the NumberBarn petition, the FCC should open an broad investigation into numbering resource sales, since these practices could lead to premature exhaust of numbering resources and impede investigations of illegal robocalling. In its most recent ex parte, NumberBarn continues to argue it is only doing what others are doing while acknowledging that “concerns regarding number exhaust and utilization are industry-wide issues” appropriately addressed through rulemakings.<sup>6</sup> NARUC agrees. Others are engaging in poor number utilization practice that violate the spirit if not the text of the FCC’s rules. The FCC should undertake a broad investigation of industry practices and audit some carriers – including NumberBarn- before acting on another petition to gain direct access to numbering resources from a carrier openly selling both toll free and non-toll free numbers.

### ***Discussion of FCC NPRM to Eliminate Ex Ante Pricing Regulation and Tariffing of Telephone Access Charges in WC Docket No. 20-71***

Last month I filed reply comments to “update the record” in this proceeding that includes links to all 22 initial comments filed in 2020, links to NARUC’s, the DC PSC, and the MA DTE reply comments in 2020, and the five initial comments filed last month to refresh the record. Those comments are available online here: <https://www.fcc.gov/ecfs/document/1082133871833/1>

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<sup>5</sup> “Telephone numbers are North American Numbering Plan (NANP) resources that are considered a public resource and are not owned by the assignees. Consequently, resources cannot be sold, brokered, bartered, or leased by the assignee for a fee or other consideration.” ATIS-0300070, Guidelines for the Administration of Telephone Numbers, section 1.0.

<sup>6</sup> NumberBarn continues to argue as a defense for its activities – that others are doing it – and because the FCC should not be addressing these issues in the context of a direct application for numbering resources – somehow – that means it should be granted access until the FCC can address the obvious (and acknowledged) issues elsewhere. Number Barn is correct that there ARE important policy issues about, *inter alia*, number exhaustion raised by its application that should only be addressed via a rulemaking. However, that fact does not provide any evidentiary support for granting its application for direct access. It suggests the opposite. Logically, the fact that everyone in the proceeding agrees there are important policy issues requiring discussion involving number plan exhaustion instead *augurs* in favor of either denial or the continued suspension of FCC action on NumberBarn’s application until any needed rulemaking (and audit) is completed. **After all, this application has been pending for five years and it has not – to date - affected NumberBarn’s business of selling an inventory of millions of numbers.**

What is notable is that no commenter supports mandatory detariffing. Some suggested permissive detariffing (and allowing the carriers to list a separate interstate surcharge on the bill). The Zingaretti Enterprise Companies provided the best summation of the comments in 2020 noting, at page 3 of their comments, that “[a]t its core, the [NPRM] seems to search for a solution to a problem that does not exist.”

Moreover, the FCC lacks statutory authority to require the interstate costs be rolled into intrastate rates.

But probably the best reason to close this docket without acting – is that - if the FCC continues with this process – it can only [1] engender confusion among customers and [2] definitively increase regulatory and implementation costs for carriers – costs that consumers will have to bear. The proposals in this proceeding are the very definition of make-work (for high cost rural carriers and state commissions) – with ratepayers footing the increased bill for what is obviously - a change in form but not in substance.

The five initial comments filed earlier this month on August 6<sup>th</sup> to refresh the record all echo both NARUC’s critiques and the criticisms of the NPRM discussed in record compiled in 2020. All continue to find critical faults in the NPRM proposal.<sup>7</sup>

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<sup>7</sup> See, August 6, 2025 (i) *Comments of WTA- Advocates for Rural Broadband*, at ii, online at <https://www.fcc.gov/ecfs/document/108060024711839/1>, arguing there is not current problem, need or benefit that warrant nationwide mandatory detariffing of TACs and pointing out that in some States – local service regulation limits the NPRM’s proposals or renders them unreasonably expensive and that mandatory detariffing raises universal service and customer relations issues. (ii) **Comments of NTCA – The Rural Broadband Association**, online at <https://www.fcc.gov/ecfs/document/10806213631634/1>, pointing out, at 1-2, that TACs continue to serve a valuable purpose in promoting universal service, avoiding customer confusion, providing certainty to providers operating in high-cost rural areas, and reducing burdens associated with recovery of regulated costs and urging the FCC to decline to mandate detariffing, and also pointing out, at 4, there are a number of states that “. . . would require everything from formal rate cases to waivers of rural exemptions just to seek permission to change consumer rates. And, even after such efforts, there would be no guarantee that these would yield sufficient recovery of the revenues lost through mandatory detariffing.” NTCA also flagged complications in other states such as limits on the size of annual rate increases or other limits enconced in state laws or rules, (iii) *Comments of the Concerned Rural LECs*, online at <https://www.fcc.gov/ecfs/document/1080668288294/1>, pointing out, at 5, that mandating the deregulation and detariffing of TACs for rate of return LECs “. . . could cause significant cost recovery issues for many RoR carriers, including intrastate ratemaking concerns, and would have implications on contributions to both the federal USF and state universal service funds.” (iv) *Comments of InCompas* online at <https://www.fcc.gov/ecfs/document/10804508628308/1>, at 2-3 of their comments pointing out that the “. . . proposed deregulation of TACs would fundamentally destabilize long-standing pricing structures, erode competitive safeguards, and place a disproportionate burden on smaller, competitive carriers that, compared to incumbent local exchange carriers (“ILECs”), lack the necessary resources to make wide-scale changes to its billing practices. These concerns are amplified, not diminished, by recent marketplace developments.” They also suggest the shift “. . . would create jurisdictional confusion and increase the administrative burden on both state regulators and providers operating across multiple regions., and finally (v) *Comments of USTelecom – The Broadband Association*, online at <https://www.fcc.gov/ecfs/document/10806270260156/1> pointing out at 2 - 3, that “. . . certain state-level requirements could make recalibrating customer bills to eliminate the tariffed line-item, while allowing carriers to recover costs appropriately, a significant challenge,” and that mandatory detariffing could “destabilize the Universal Service fund” and ma “increase customer confusion.”

Nothing in the record before the agency, including the initial comments filed earlier this month, provide a justification or legal basis for the FCC to take additional action in this proceeding. At a minimum, before acting, the FCC should consider discussing the separations and universal service issues clearly implicated by the NPRM proposals with the both the Separations and Universal Service Joint Boards. The record is replete with examples of the impact in both areas.

**Respectfully Submitted,**

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**September 1, 2025**

**cc Danielle Thumann, Senior Counsel, Office of Chairman Carr  
Marcus Maher, Senior Legal Advisor, Office of Commissioner Trusty  
Deena Shetler, Chief of Staff and Legal advisor, Office of Commissioner Gomez  
Joseph Calascione, Chief, FCC Wireline Competition Bureau  
Cara Voth, Deputy Bureau Chief, Wireline Competition Bureau  
Jodie May, Division Chief, Competition Policy Division, Wireline Competition Bureau  
Ed Krachmer, Deputy Chief Competition Policy Division, Wireline Competition Bureau**

## APPENDIX – NARUC’S THREE RECENT NUMBERING RESOLUTIONS

### **[1] Resolution Encouraging the Federal Communications Commission To Investigate the Sale and/or Brokering of Toll-Free and Non-Toll-Free Telephone Numbers to Ensure Number Resource Optimization**

*Whereas* the North American Numbering Plan (NANP), the plan for telephone numbering in North America and the Caribbean, is currently projected to run out of telephone numbers (TN) between 2049 and 2054 (NANPA Website) and potentially sooner if current trends in telephone number usage continue;

*Whereas* according to industry numbering rules, the North American Numbering Plan Administrator (NANPA) will begin work on an expansion plan when the NANP is within 15 years of exhaust: (Section 6.2 of the NPA Allocation Plan and Assignment INC Guidelines);

*Whereas* based on current projections, planning for a NANP expansion could begin in just 13 years, in 2037; (ITN Report <sup>8</sup>3 Appendix);

*Whereas* transitioning to an expanded plan after number exhaustion would require moving to 12-digit dialing at an estimated societal cost of up to \$270 billion; (Internet of Things Notice);

*Whereas* State Commissions, in their efforts to ensure that telephone numbers are used efficiently and legally, are facing issues caused by service providers that appear to fail to comply with federal numbering rules, industry guidelines, and the numbering authority delegated to the States;

*Whereas* a number of State Commissions have reported that some telecommunications carriers, including Voice over Internet Protocol (VoIP) service providers, appear to be transferring telephone numbers to companies that warehouse these numbers or engage in their sale or licensing;

*Whereas* one of these companies claims to have access to nearly 73 million telephone numbers for sale or auction;

*Whereas* at least one of these companies has applied for direct access to numbering resources;

*Whereas* some of these companies have websites that offer an auction capability to buy vanity numbers sometimes for millions of dollars;

*Whereas* the NANC asked the Alliance for Telecommunications Industry Solutions (ATIS) Industry Numbering Committee (INC) to investigate the brokering of geographic telephone numbers as long ago as September 30, 2015, following credible reports of numbers being sold; (INC Guidelines relating to such transactions apply to service providers, not individual users.<sup>9</sup>);

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<sup>8</sup> Report and Recommendation on the Feasibility of Individual Telephone Number (ITN) Pooling Trials and Alternative Means for Conserving Numbering Resources (ITN Report).

<sup>9</sup> “Telephone numbers are North American Numbering Plan (NANP) resources that are considered a public resource and are not owned by the assignees. Consequently, resources cannot be sold, brokered, bartered, or leased by the assignee for a fee or other consideration.” ATIS-0300070, Guidelines for the Administration of Telephone Numbers, section 1.0.

*Whereas* nine years after the NANC’s request for action, these companies appear to have continued to broker and warehouse telephone numbers at the expense of area codes, particularly those edging towards exhaust;

*Whereas* the FCC rules regarding number conservation include: counting service providers’ number utilization (including obtaining growth codes) only for assigned numbers;<sup>10</sup> placing a 180-day limit on holding numbers in “reserved” status,<sup>11</sup> and requiring sequential number assignment, which imposes limits on a service provider’s ability to provide customers with “vanity” numbers;<sup>12</sup>

*Whereas* ATIS guidelines prohibit end users from selling numbers<sup>13</sup> and some local exchange tariffs and/or customer agreements include language indicating that the customer has no property right to TNs;

*Whereas* on February 28, 2023, the NANC approved the ITN Report recommending, among other things, further detailed study on the brokering of geographic numbers, and a review of industry guidelines and policies be performed to determine the impact of these processes on number resource utilization and the need for clarification/modification of numbering rules;

*Whereas* the ITN Report recommended that the FCC consider using its audit processes to address the brokering and mischaracterization of numbers;

*Whereas* NARUC has reconstituted its Numbering Subgroup to increase State Commission focus and participation on numbering issues;

*Whereas* despite the funding the NANC has approved to audit companies to ensure compliance with its numbering rules and guidelines, there has not been a numbering audit of a telecommunications carrier or Voice over Internet Protocol service provider in at least 15 years; (47 CFR 52.15(k) and ITN Report); and

*Whereas* as numbering resources dwindle, State Commissions need more tools and resources to enforce both state and federal numbering rules; *now therefore be it*

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened at its 2024 Annual Meeting in Anaheim, California, urges the FCC to use the audit authority outlined in 47 CFR 52.15(k) to determine how companies are brokering or auctioning toll-free and other numbers via their websites and to determine how these companies obtain these telephone numbers, to ensure that the numbering rules are followed, and to determine if additional rules are needed to prevent premature number exhaust.

*Adopted by the NARUC Board of Directors on November 13, 2024.*

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<sup>10</sup> See generally 47 CFR § 52.15 (h); see also VoIP Direct Access Order, FCC 15-70, ¶ 32 (clarifying “that the terms „end users“ and „customers“ [in „assigned numbers“] do not include telecommunications carriers and non-carrier voice or telecommunication service providers).

<sup>11</sup> 47 CFR § 52.15 (f); Number Resource Optimization, 17 FCC Rcd 252, ¶¶ 121-22 (2001) (“limit[ing] the amount of numbers that are set aside for use by a particular customer but are not being used to provide service on a regular basis.”).

<sup>12</sup> 47 CFR § 52.15 (j).

<sup>13</sup> ATIS-0300119, Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines, § 2.1.

**[2] Resolution Encouraging the Federal Communications Commission To Stop Robocalling and Improve the Efficiency of Numbering Resources by Auditing Telecommunications Carriers and Voice over Internet Protocol service providers Failing to Legally and Efficiently Use Finite Telephone Numbers**

*Whereas* the North American Numbering Plan (NANP), the telephone numbering plan providing numbering resources to North America and the Caribbean, is currently expected to run out of telephone numbers by 2051; (NANPA website);

*Whereas* if current trends in telephone number usage continue, the NANP could run out of numbers even sooner;

*Whereas* according to industry numbering rules, when the NANP is scheduled to exhaust within 15 years, the North American Numbering Planning Administrator (NANPA) will commence work on a NANP expansion plan. (Section 6.2 of the NPA Allocation Plan and Assignment INC Guidelines);

*Whereas* based on current projections, planning for NANP expansion would begin in just 12 years in 2036 (ITN Report Appendix);

*Whereas* transitioning to an expanded plan would require moving to 12-digit dialing;

*Whereas* previous estimates by the Federal Communication Commission (FCC) suggest that the transition to 12-digit dialing could have a societal cost of up to \$270 billion; (IOT Notice);

*Whereas* state commissions, in their efforts to ensure that telephone numbers are used efficiently and legally, are facing issues caused by carriers that fail to comply with federal numbering rules and the numbering authority delegated to the states;

*Whereas* state commissions have partnered with and enjoyed a great deal of cooperation from many telecommunications carriers, especially large, national carriers; however, there remain bad actors whose misuse of numbering resources causes problems for the state commissions and the industry alike;

*Whereas* a number of state commissions have reported that many telecommunications carriers and Voice over Internet Protocol service providers fail to fulfil basic reporting requirements, over- inflate the forecasted need for telephone numbers, and use blocks of thousands of numbers inefficiently, contaminating them for future use by another carrier;

*Whereas* some telecommunications carriers and Voice over Internet Protocol (VoIP) service providers are knowingly facilitating illegal robocalling and circumventing FCC rules by renting finite telephone numbering resources to wholesale telecommunications customers who are often located outside of the United States;

*Whereas* illegal robocallers seek out “local telephone numbers” from wholesale telecommunications carriers such as Interconnected (I-VoIP) providers and Competitive Local Exchange Carriers to target unsuspecting victims by calling them from a number that looks “familiar” from a “neighboring” community;

*Whereas* under normal FCC rules, these scam efforts could be reduced, but by using rented telephone numbers from wholesale providers of telephone numbers, robocalling rules can still be defeated or circumvented;

*Whereas* state commissions, through their ongoing review of numbering resource requests from telecommunications carriers and VoIP providers, are in a unique position to identify inefficient, unusual, or bad behavior from telecommunication carriers and Voice over Internet Protocol service providers with direct access to numbering resources;

*Whereas* NARUC is reconstituting its Numbering Subcommittee to increase state commission focus on this issue;

*Whereas* the FCC has established an audit program in its rules and the NANPA budget includes funding for such audit expenses, but there has not been an audit of a telecommunications carrier or VoIP service providers in at least a decade; (47 CFR 52.15(k) and ITN Report)

Whereas as numbering resources dwindle, due in part to poor management by some telecommunications carriers and VoIP service providers with direct access to numbering resources, state commissions need more tools and resources available to them as the regulatory outpost of the FCC to enforce both state and federal numbering rules; *now therefore be it*

***Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened at its 2024 Winter Policy Summit in Washington, D.C., urges the FCC to act to provide updated guidance on how states should bring forward cases of telephone number resource mismanagement or suspected robocalling using rented telephone numbers to the Commission using the audit process outlined in 47 CFR 52.15(k).**

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*Passed by the Committee on Telecommunications February 26, 2024*  
*Adopted by the NARUC Board of Directors February 28, 2024.*

**[3] Resolution Encouraging the Federal Communications Commission to Develop Mechanisms to Coordinate with State Utility Commissions to Ensure Number Resource Optimization**

*Whereas* in 1991, the National Association of Regulatory Utility Commissioners (NARUC) petitioned the Federal Communications Commission (FCC) to release a Notice of Inquiry (NOI) seeking information and comment on the administration of the North American Numbering Plan (NANP), the plan for telephone numbering in North America and the Caribbean (NARUC Petition);<sup>14</sup>

*Whereas* the NARUC Petition noted that Bellcore, the administrator for telephone numbering resources in 1991, indicated that input from state public utility commissions (state commissions) was needed in guiding future telephone numbering activity;<sup>15</sup>

*Whereas* on July 13, 1995, the FCC issued a Report and Order establishing the North American Numbering Council (NANC), a Federal Advisory Committee (FAC) to advise the FCC on numbering issues, direct the NANP Administrator, apply FCC policy to resolve issues arising in the administration of the NANP, and conduct initial dispute resolution of numbering issues;<sup>16</sup>

*Whereas* the FCC envisioned that NARUC and state commissions would participate as members of the NANC;<sup>17</sup>

*Whereas* the first meeting of the NANC was on October 1, 1996;

*Whereas* since that first meeting, NARUC and state commissions have consistently participated in and led the NANC and several of its working groups;

*Whereas* the NANC and its working groups have consistently sought input from NARUC and state commissions on a wide range of telephone numbering issues, including the development of NANC reports;

*Whereas* the NANC provided a forum for industry, state commissions, and other interested parties to jointly resolve telephone numbering issues and disputes;

*Whereas* the FCC has determined that the NANC will not be rechartered as a FAC after its current charter expires on September 8, 2025;

*Whereas* the FCC will assume many of the responsibilities of the NANC;

*Whereas* the FCC has delegated many operational numbering activities to state commissions who have used that authority to identify problems with numbering administration and to create potential solutions to those problems;

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<sup>14</sup> National Association of Regulatory Utility Commissioners' Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan (NARUC Petition), filed September 26, 1991.

<sup>15</sup> NARUC Petition at 6-7.

<sup>16</sup> *Administration of the North American Numbering Plan*, CC Docket No. 92-237, Report and Order, 11 FCC Rcd 2588, 2608 (July 13, 1995).

<sup>17</sup> Report and Order, 11 FCC Rcd 2588, 2609.

*Whereas* with the end of the NANC, state commissions now need a replacement mechanism to communicate with the FCC and industry regarding problems and disputes related to numbering issues; *and*

*Whereas* state commissions also need more tools and resources to enforce both state and federal numbering rules in conjunction with the FCC; *now therefore be it*

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners, convened at its 2025 Summer Policy Summit in Boston, Massachusetts, *urges the FCC to develop a formal mechanism, beyond filing a petition, comments, and ex partes in ongoing proceedings, to identify and act upon NARUC and state commission proposals on telephone numbering issues.*

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*Passed the Committee on Telecommunications on July 28, 2025.*

*Adopted by the NARUC Board of Directors on July 30, 2025.*