

Resolution on Nationwide Number Portability

Whereas in November 2015, the Chief of the Federal Communications Commission’s (“FCC’s”) Wireline Competition Bureau requested that the North American Numbering Council (“NANC”) evaluate the ability of a consumer to retain her or his telephone number when either physically moving or switching to another wireline or wireless service provider anywhere in the United States, which has been referred to as “nationwide number portability” (“NNP”) or “non-geographic number portability” (“NGNP”);

Whereas the Alliance for Telecommunications Industry Solutions (“ATIS”), through its Industry Numbering Committee (“INC”), previously evaluated issues related to the future of telephone numbers, including rate center consolidation and national 10-digit dialing; and in so doing identified various consumer and regulatory considerations that state and federal regulators must address (“Technical Report on Nationwide Number Portability Study”: ATIS-1000071; June 20, 2016);

Whereas the NANC endorsed a “Report on NNP” by the Future of Numbering (“FON”) Working Group (“WG”) to consider proposals related to the future of telephone numbers, including 10-digit dialing in relation to NNP; and on May 16, 2016 the NANC submitted the report to the FCC, which found certain likely impacts in the following areas: Mandated Fees and Surcharges assessed upon Telecommunications Service based upon Physical Address; Mandated State and Local Sales Taxes; Intrastate Tariffed Telecommunications Services; Intrastate Toll Telecommunications Services; Tariffs and Rulemaking; State Coordination & Collaboration; 10-Digit Dialing; Customer Complaints; and Public Safety (911/NG911);

Whereas State public utility commissions have been delegated authority by the FCC to approve and implement the methodology for area code relief, including whether to require 10-digit local dialing, which may be required for NNP;

Whereas on October 26, 2017, the FCC adopted a Notice of Proposed Rulemaking (“NPRM”) and Notice of Inquiry (“NOI”) (Docket Nos.: WC 17-244 and WC 13-97), which invite comment on steps that would lay the groundwork to achieve NNP and seek comment on a variety of issues related to the deployment of NNP, in particular, four models for NNP: (1) nationwide implementation of Location Routing Numbers (“LRNs”); (2) non-geographic LRNs; (3) commercial agreements; and (4) Iconnectiv’s GR-2982 CORE specification;

Whereas on December 7, 2017 the FCC Wireline Competition Bureau directed the NANC to:

- Determine whether any of the four models discussed in the NOI are preferable to others in terms of feasibility, cost, and adaptability to changing markets and technologies;
- Specify in detail the potential costs, benefits, and barriers to implementing each of these proposals;
- Identify any likely consequences of these proposals for routing, interconnection, or public safety;
- Recommend next steps to advance full nationwide number portability; and
- Make any other recommendations it deems necessary to achieve this goal;

and to approve a written report on its findings and to transmit the report to the FCC Wireline Competition Bureau by April 6, 2018; *now therefore be it*

Resolved that the Board of Directors of the National Association of Regulatory Utility Commissioners, convened at its 2018 Winter Policy Summit in Washington, DC, urges the FCC to carefully consider issues outlined in the North American Numbering Council's May 16, 2016 "Report on NNP," so as to avoid known concerns; and that the FCC disclose for public comment: (1) the costs to consumers to implement NNP; (2) the cost recovery options for NNP implementation; (3) the timeline options for implementing NNP; and (4) the impact of NNP implementation on the IP transition.

Sponsored by the Committee on Consumers and the Public Interest and the Committee on Telecommunications

Adopted by the NARUC Board of Directors February 14, 2018