

Federal Communications  
Commission

MAY 14 2019

Office of the Secretary



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April 30, 2019

Ms. Kris Monteith  
Bureau Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12 St., S.W.  
Washington, DC 20554

Mr. Patrick Webre  
Bureau Chief  
Consumer and Governmental Affairs  
Federal Communications Commission  
445 12 St., S.W.  
Washington, DC 20554

RE: NUMBERING ADMINISTRATION OVERSIGHT WORKING GROUP  
(NAOWG) FORMAL REQUEST FOR AN EXTENSION OF TIME FOR THE  
REASSIGNED NUMBERS DATA BASE (RND). FCC 18-177; CG DOCKET NO. 17-  
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Dear Ms. Monteith and Mr. Webre:

On behalf of the NAOWG, I respectfully request an extension of the deadline for NAOWG to complete its work on the technical and operational issues of the RND. This work is presently due to the FCC by June 13, 2019, and this letter seeks an extension of that deadline by 10 months. This request comes amid a variety of circumstances that resulted in the working group being unable to meet the FCC's deadline.

FCC 18-177 was released on December 13, 2018, and it provided six months for the NAOWG to develop a technical requirements document (TRD). In addition to the TRD, the NAOWG is tasked with preparing a report outlining the mechanisms for the fee structure and pricing for the users of the database, and recommending a funding mechanism that will require modifications to the Billing & Collections Agent's responsibilities and contract.

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The kick-off meeting was held on February 9, 2019, following the month-long shutdown of the federal government that prevented work on this topic from proceeding. Since that time, the working group has been meeting twice a week to progress the effort, and is now meeting for two hours at each meeting. The NAOWG's review of this significant work effort to date has since made clear that the June deadline is not feasible. The NAOWG has not previously developed an industry database that could be considered as similar to the RND, nor a funding and pricing/fee structure as described within the FCC's order.

FCC 18-177 referenced the RND's similarities with other governmental transactional databases and synergies with the NANPA/PA systems. The NAOWG is familiar with the NANPA/PA systems, but it has recognized that the RND will be a much more transaction-intensive database. The NAOWG anticipates it will have few administrative and functional similarities with the NANPA/PA systems. As such, the NAOWG has asked FCC staff for assistance with obtaining information associated with other governmental transactional databases, such as the Do Not Call database, since such information is likely more relevant to the design of the RND. The NAOWG has yet to receive this information. In an effort to move forward, the NAOWG has commenced the TRD process, albeit with little informative basis from which to start. Vendors that operate similar databases appear reluctant to assist the working group for fear that they may be disqualified from bidding on the resulting RFP for the RND contract.

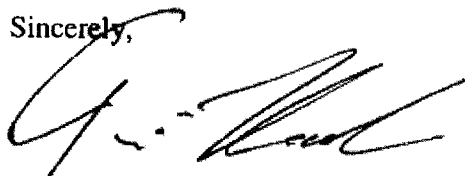
Finally, in addition to the NAOWG's work on this project, the same volunteer members of NAOWG have also been developing a feasibility report on the establishment of a 3-digit code for a national suicide prevention and mental health crisis hotline system, referred to the NAOWG on November 8, 2018. The feasibility report was discussed at the NANC meeting held on February 14, 2019, and was tabled pending the resolution of certain issues. On February 22, 2019, the FCC sent a second referral letter to the NANC, requesting additional work on the report. From November 28, 2018 through April 11, 2019, the NAOWG met for 75 hours of group meetings, across 31 meetings, to complete the feasibility report. Furthermore, some of the NAOWG members were also working on Nationwide Number Portability Subcommittee's report, also due to the NANC and FCC in the same general timeframe. Each NAOWG member likely has spent at least as many hours (if not more) outside of these group meetings developing contributions and preparing for group meetings, as was spent in these group meetings.

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Given the complexity of and the overlap of all of these reports, the time constraints of the working group members and the various interruptions in schedules, an extension of the RND work is necessary. Therefore, the NAOWG is requesting a 10-month extension to complete the TRD as well as the accompanying report described above.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Kavulla', written in a cursive style.

Travis Kavulla

Chair

North American Numbering Council

Cc: Marilyn Jones, FCC