



InCharge Systems, Inc.
317 6th Avenue, Suite 900
Des Moines, IA 50309

VIA ECFS

Date: June 6, 2018

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Comments on CG Docket No. 17-59 – Reassigned Numbers Second FNPRM

Dear Ms. Dortch,

InCharge Systems, Inc. (ICS)¹ appreciates the opportunity to comment on the Reassigned Numbers Second FNPRM.²

We wish to address three items mentioned in the document:

- Scope and use of the database
- Structure of the database
- Future considerations

In brief, we believe that a Reassigned Numbers database, based on disconnection information, suitably scoped and implemented, is a timely addition to the current and future countermeasures for mitigating unwanted and/or illegal calls/robocalls.

1. Scope of the Reassigned Numbers Database

ICS supports the proposal to provide information on disconnections.³ The fundamental premise of this effort is to advise callers that their assumptions about an existing relationship concerning a number and its assignee are no longer in effect once the number is disconnected. Guidance for this model is suggested by consumer information about the National Do Not Call Registry⁴ and its registrations for personal phone numbers:

¹ ICS has been an active contributor to the ATIS Testbeds Focus Group since its inception, and a member of ATIS/SIP Forum IP-NNI Task Force since it began its work on STIR/SHAKEN. ICS successfully demonstrated STI-CA and STI-CR use of Telephone Number certificates and Service Provider Code certificates in testing with the ATIS Robocalling Testbed, hosted by Neustar.

² *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Second Further Notice of Proposed Rulemaking, FCC 18-31 (Mar. 22, 2018) (*Reassigned Numbers Second FNPRM*).

³ *Reassigned Numbers Second FNPRM*, par. 15.

⁴ See <https://www.consumer.ftc.gov/articles/0108-national-do-not-call-registry>.

- “The system removes numbers automatically when they are disconnected and reassigned.”
- “If your number is disconnected and then reconnected, you might need to re-register.”

Furthermore, we believe the information stored⁵ should be minimal, namely, a phone number and its date of last previous disconnection. An alternative would be to store the number, most recent assignment status,⁶ and the date. To contain more information could lead to loss of privacy, data leakage, and even the potential for numbers shown as reassigned to be harvested as targets for robocalls.

2. Structure of the Reassigned Numbers Database System

ICS supports a single database designated by the FCC. We believe that a single, authoritative, primary source of disconnected numbers and dates is the preferred structure for such a system. This approach simplifies implementation and operations, enhances data integrity, and facilitates the use of the system, as compared to alternative ways to field such a system.

3. Future considerations

Given the rapid changes ahead in combatting unwanted/illegals calls, as well as in networks, devices, and services, we believe that the design of this system should take into account considerations of future uses and infrastructure. For example, the design should allow for adding additional data elements if their use is appropriate and justifiable. The system should allow for eventual evolution and/or migration, as the landscape of calling and mitigation of unwanted/illegals calls will change over time.

Thank you for this opportunity to comment.

Respectfully submitted,

/s/ Michael D. Hamilton

Michael D. Hamilton, President, InCharge Systems

Email: mikehamilton@inchargesys.com

Tel: +1.515.224.9600

⁵ *Reassigned Numbers Second FNPRM*, par. 16.

⁶ For example: disconnected, aged, available, assigned (see *Reassigned Numbers Second FNPRM*, par. 14).