

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
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	)	
Advanced Methods to Target and Eliminate	)	CG Docket No. 17-59
Unlawful Robocalls	)	
	)	

**COMMENTS OF SORENSON COMMUNICATIONS, INC.**

Sorenson Communications, Inc. (“Sorenson”) submits these comments in response to the Commission’s Second Further Notice of Proposed Rulemaking (“*Second FNPRM*”)<sup>1</sup> on ways to address the problem of unwanted calls to reassigned numbers intended for another consumer. Among other things, the *Second FNPRM* seeks comment on which service providers should be required to report data to a single, FCC-designated reassigned numbers database,<sup>2</sup> and whether service providers that offer only telecommunications relay services (“TRS”) should be exempted from the obligation to report data to such database.<sup>3</sup>

Sorenson supports the Commission’s efforts to address the problem of unwanted calls to reassigned numbers by creating an effective reassigned numbers database that contains both comprehensive and timely data for callers to discover reassignments before they occur. TRS users should have access to the same protections against unwanted calls to reassigned numbers as hearing users have in this context. As explained below, numbering information about TRS users

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Second Further Notice of Proposed Rulemaking, CG Docket No. 17-59, FCC 18-31 (rel. Mar 23, 2018).

<sup>2</sup> *Id.* ¶ 39.

<sup>3</sup> *Id.* ¶ 41.

is imbedded in the Numbering Resource Utilization and Forecast (“NRUF”) data of the carrier from which it has been obtained and does not accurately represent the number assignment designation for most TRS users.

Today, TRS providers obtain numbers through carrier number partners, not directly from the numbering administrators.<sup>4</sup> As a result, the obligation to report reassignment information for numbers assigned to TRS providers for use by TRS users in the proposed FCC-designated reassignment database should remain with the carrier number partners, who are subject to existing number utilization and reporting requirements. Among other things, the Numbering Resource Utilization and Forecast (“NRUF”) reporting rules require carrier number partners to report how many of their numbers have been designated as “assigned” or “intermediate.” An “intermediate” number is one that is made available to a carrier or non-carrier entity (such as a TRS provider) from another carrier, but has not necessarily been assigned to an end-user or customer by the receiving carrier or non-carrier entity.<sup>5</sup> An “assigned” number is one that has been assigned to a specific end-user or customer.<sup>6</sup>

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<sup>4</sup> TRS providers do not have direct access to request numbers from the numbering administrators. Section 52.15(g)(2) of the Commission’s rules, 47 C.F.R. § 52.15(g)(2), limits access to telephone numbers to entities that demonstrate they are authorized to provide service in the area for which the numbers are being requested. The Commission has interpreted this rule as requiring evidence of either a state certificate of public convenience and necessity (CPCN) or a Commission license. As a practical matter, generally only telecommunications carriers and VoIP providers are able to provide the proof of authorization required under the rules, and thus able to obtain numbers directly from the Numbering Administrators. Neither authorization is typically available in practice to TRS providers. As a result, TRS providers do not obtain telephone numbers directly from the Numbering Administrators. Instead, TRS providers obtain telephone numbers from carrier numbering partners.

<sup>5</sup> Section 52.15(f)(v) defines “intermediate numbers” as numbers that are available for use by another telecommunications carrier or non-carrier entity for the purpose of providing telecommunications service to an end user or customer. 47 C.F.R. § 52.15(f)(v).

<sup>6</sup> Section 52.15(f)(iii) defines “assigned numbers” as numbers working in the Public Switched Telephone Network under an agreement such as a contract or tariff at the request of specific

When a number is allocated to a partner carrier and the partner carrier assigns that number to a wholesale customer, such as a TRS provider, section 52.15(f)(1)(v) of the Commission's rules requires that these numbers be reported as "intermediate" on the carrier's NRUF report until the numbers have been assigned to a retail end user.<sup>7</sup>

To ensure carrier number partners have accurate information about initial assignment and reassignment to TRS users for NRUF reporting and for reporting to the proposed FCC-designated reassigned numbers database, Sorenson urges the Commission to require carrier number partners to provide TRS providers with a web portal or other tool to enable TRS providers to timely report relevant number information about their TRS users' assigned, disconnected, and reassigned numbers. This will ensure carrier number partners have the most comprehensive and timely information for purposes of NRUF reporting and for when reassignment information is reported to the proposed FCC-designated reassigned numbers database. Mandatory participation by all TRS providers is necessary to ensure consumers and callers realize the full benefits of the database. Otherwise, the database will contain insufficient reassignment information, and thus likely would not be any more comprehensive than existing tools. This will help ensure the database the Commission establishes maximizes the benefits to consumers and callers by providing relevant information in a timely, inexpensive, and accessible

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end users or customers for their use, or numbers not yet working but having a customer service order pending.

<sup>7</sup> In the *2015 Direct Access Order*, the Commission clarified that numbers provided to carriers, or other non-carrier entities by numbering partners should be reported as "intermediate," and do not qualify as "end-users" or "customers" as those terms are used in the definition of "assigned numbers" in section 52.15(f)(1)(iii) of the Commission's rules. *Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd. 6839, 6854 ¶ 32 (2015) ("*2015 Direct Access Order*").

manner, without imposing undue costs on the providers tasked with supplying relevant information.

Finally, if there are costs associated with TRS provider gaining access to the carrier partner number database to provide user number and reassignment information, the associated expenses should be considered allowable costs for TRS compensation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John T. Nakahata', is positioned above the typed name.

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