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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 Government 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-
59

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 September 13, 2019. This request comes amid a variety of circumstances outlined in the NANC's initial request for an extension in its letter dated April 30, 2019. The same circumstances referenced in the previous letter are still relevant today and the working group believes it will be unable to meet the FCC's deadline.

TDA 19-554 was released on June 12, 2019 and provided the NANC with a three-month extension with the addition of a progress report that was provided to the Commission on July 11, 2019. The progress report outlined the efforts of the working group associated with the development of the RND Technical Requirements and the anticipated work that remains to be completed to meet the Commission's requirements of its Order to provide a cost efficient yet valued service to callers. The July 11, 2019 status report also indicated the potential that the NAOWG would request an additional extension. Although the NAOWG has continued its diligent work there still remains work to complete.

FCC 18-177 was released on December 13, 2018 and provided only 6 months for the NAOWG to develop a technical requirements document (TRD), as well as a report outlining the mechanisms for the fee structure and pricing for the users of the database, and a funding mechanism that will require modifications to the Billing & Collections Agent's responsibilities and contract. The NAOWG's review of this significant work effort has made clear that the timeline provided is insufficient. The NAOWG has not previously developed an industry database that could be considered as similar to the RND, nor the funding and pricing/fee structure described within the FCC's order.

The NAOWG continues to believe that its original extension request would be sufficient to complete its report. In its April 30, 2019 letter, the NAOWG anticipated completion of its work by April 13, 2020 as the result of a 10-month extension. Since the kick-off meeting was held on February 9, 2019, the working group has been meeting twice a week for two hours each meeting. The progress has been slow given the complexity of this task, but the working group's approach has focused on resolving details which, if left unresolved, would simply defer work on this important TRD to another time.

Regrettably, the NAOWG has been forced to proceed with little informative basis. Although other databases appear to exist that may be similar, the NAOWG's leadership informs me that the vendors that operate such databases may be reluctant to assist the working group for fear they may be disqualified from bidding on the resulting RFP for the RND contract. Thus, the NAOWG is working with the NANC's Designated Federal Officer to establish a path forward that would allow the NAOWG to become informed by potential vendors on important details in the development of the RND TRD. However, additional time may be used to identify the appropriate path and solicit additional expertise in the development of such a database as well as determining if there may be further benefit in consulting potential users of an RND. The working group continues to establish its baseline document and plans to supplement the document based upon engagement with stake holder expertise.

Given the complexity of the reports, the time constraints of the working group members and the need to obtain further outside resources, the need for an additional extension to complete a viable

RND report that the NANC can forward confidently to the FCC is necessary. The NAOWG is nearing completion of the system requirements such as system capabilities. However, addressing system reports, audits user system training and user help are content of the TRD that still remains to be developed. In addition, the NAOWG has yet to consider the cost recovery and the required modifications to the Billing & Collections Agent's responsibilities as well as the fee structure elements of FCC 18-177 including how ongoing system improvements would be requested and funded. Although it is likely that the TRD portion of the report may be completed near the end of 2019, the cost recovery and fee structure development will begin immediately thereafter and require undetermined expertise and time. Therefore, the NAOWG is requesting a seven-month extension to complete the TRD, as well the report outlining the cost recovery and the mechanisms for the fee structure for the users of the database.

Please let me know if you have any questions.

Sincerely,

/Travis Kavulla/

Travis Kavulla
Chairman, North American Numbering Council
Energy Policy Director, R Street Institute