August 16, 2019

Ms. Marlene Dortch

Secretary

Federal Communications Commission

445 12th St. SW

Washington, D.C. 20554

**Re: USTelecom Ex Parte Notice, CG Docket No.17-59, *Advanced Methods to Target and Eliminate Unlawful Robocalls***

Dear Ms. Dortch:

On August 14, 2019, the undersigned, along with Jacquelyne Flemming of AT&T, Phil Linse of CenturyLink (via teleconference), Chris Oatway of Verizon (via teleconference), and Glenn Reynolds of iconectiv, met with Kristi Thornton (via teleconference) and Josh Zeldis (via teleconference) from the Consumer and Governmental Affairs Bureau and Pam Arluk, Ed Krachmer, Marilyn Jones, and William Anderle of the Wireline Competition Bureau in support of USTelecom’s joint limited Petition for Reconsideration (Petition) of the Commission’s Reassigned Number Database (RNDB).[[1]](#footnote-1)

USTelecom expressed its appreciation for the work that the Commission did to stand up the RNDB and emphasized that the scope of our Petition is small, but important.Specifically, and consistent with our Petition, we are asking the Commission to reconsider its decision to merge the administration of the RNDB with the consolidated North American Numbering Plan Administrator (NANPA) and Pooling Administrator (PA) functions under a single contract and a single administrator. With this comes a related request for flexibility to consider administrator funding scenarios beyond the existing decision to recover the upfront database costs from service providers through the mechanism that is currently used to recover the NANPA and PA costs.

USTelecom explained that adopting our proposal has three primary benefits: (1) it is operationally more efficient; (2) it will be more cost-effective; and (3) and it will allow the Commission to stand up the RNDB faster than it could under a combined contract. The group also explored the theory raised in iconectiv’s comments questioning whether reconsideration is required because the prospective language at issue may not legally obligate the Commission to procure the services in the suggested manner.[[2]](#footnote-2) Finally, the group discussed the complicated technical and operational issues under examination by the Numbering Administration Oversight Working Group (NAOWG), and the NAOWG’s pending request for an extension to complete its important and time intensive work to provide fully informed recommendations to establish the RNDB.[[3]](#footnote-3)

USTelecom continues to support the timely implementation of the RNDB, and encourages the Commission to act swiftly on our Petition so it can move forward with the RFP for the consolidated NANPA/PA contract and more quickly stand up the RNDB to help fight the scourge of robocalls.

Please contact me with any questions.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_\_

Kristine Hackman

Vice President, Policy & Advocacy

cc: William Anderle

Pam Arluk

Marilyn Jones

Ed Krachmer

Kristi Thornton

Josh Zeldis

1. Competitive Carriers Association, CTIA, and USTelecom-The Broadband Association Joint Petition for Reconsideration, CG Docket No. 17-59 (filed Apr. 25, 2019). [↑](#footnote-ref-1)
2. Reply Comments of iconectiv in Support of Petition for Reconsideration, CG Docket No. 17-59, 2-7 (filed June 3, 2019). [↑](#footnote-ref-2)
3. Letter from Travis Kavulla, Chairman of the North American Numbering Council (NANC) to Patrick Webre, Chief, FCC Consumer and Governmental Affairs Bureau and Kris Monteith, Chief, FCC Wireline Competition Bureau (August 14, 2019). [↑](#footnote-ref-3)