

December 6, 2018

Notice of Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Dkt. 17-59

Dear Ms. Dortch:

This is to inform you that on December 4, 2018, Kathy Timko, Chris Drake, and myself, had separate meetings with the following individuals in connection with the above-referenced proceeding: Commissioner Michael O' Reilly and Kegan Despain; Zenji Nakazawa, Legal Advisor to Chairman Pai; and Travis Litman, Chief of Staff to Commissioner Rosenworcel.

During these meetings, iconectiv shared perspectives on the characteristics of the proposed Reassigned Numbers Database (RND) as well as their relation to the functions of the NANPA and Pooling Administration (NANPA/PA) databases. We identified a number of key operational and design differences including:

- In addition to the telemarketing and collection agencies identified in the draft, the RND is likely to be used by thousands of other enterprises that make legitimate commercial calls driving demand on the RND service to billions of queries per month in real-time. The NANPA/PA processes less than 20,000 requests for number blocks in that period which are not processed in real-time;
- An RND will likely need to process millions of individual telephone numbers per month, while the NANPA/PA ingests and assimilates less than 2,000 NRUF reports per month at the thousand block level;
- An RND as proposed in the draft order will require an extensive billing and collection infrastructure in order to track and recover usage fees from thousands of non-regulated users, whereas NANPA/PA issues invoices only to the B&C agent.

iconectiv noted that while the draft order indicates that the Commission intends to select an administrator for the reassigned numbers database through a competitive bidding process, presupposing combining the RND service with the consolidated NANPA/PA constrains the options and timeline for how a vendor would be selected and is likely to unnecessarily limit

competition for offering the service with potentially negative impacts on the ultimate quality and cost. In light of the absence of a record on these complex issues, iconectiv recommended that the Commission instead refer them to the NANC and that the order clarify that the NANC will have latitude to recommend an approach best suited to a successful competitive procurement.

Additionally, iconectiv, as Administrator of the NPAC, addressed certain statements in the draft order concerning the relative costs of the NPAC operations with the expected costs of operating the proposed RND. We noted that such a comparison fails to account for likely differences in the frequency of updates to the database. We further explained that the NPAC primarily distributes updates as batch transmissions to a few dozen recipients who support the rest of the industry, whereas the RND will need to support real-time queries in massive volumes to potentially thousands of interested parties. Customers will also need to be registered and onboarded and their intentions vetted as users of the service. Finally, iconectiv emphasized that many of the key cost drivers have not yet been established, including Service Level Agreements.

If you have any questions concerning this notice, please contact me at 202-579-4205.

Sincerely,

Glenn T. Reynolds
Head of Government and Industry Affairs
iconectiv

cc: Zenji Nakazawa
Travis Litman
Kegan Despain