

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Administration of the North American
Numbering Plan

Millicorp Petition for Limited Waiver
Of Section 52.15(g)(2)(i) of the Commission's
Rules Regarding Access to Numbering
Resources

SmartEdgeNet, LLC Petition for Limited Waiver
Of Section 52.15(g)(2)(i) of the Commission's
Rules Regarding Access to Numbering
Resources

CC Docket 99-200

**COMMENTS OF BANDWIDTH.COM, INC.,
LEVEL 3 COMMUNICATIONS, LLC,
AND COMPTTEL**

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May 8, 2012

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Bandwidth.com, Inc. ("Bandwidth.com"), Level 3 Communications, LLC ("Level 3"), and COMPTTEL (collectively, "Joint Commenters") submit these comments in response to the Wireline Competition Bureau's Public Notice ("*Public Notice*")¹ seeking comment on the recent petitions of SmartEdgeNet, LLC ("SEN"), filed March 6, 2012 ("SEN Petition"), and Millicorp, LLC, filed May 8, 2012 ("Millicorp Petition") (collectively, "Petitions"), for limited waiver of section 52.15(g)(2)(i) of the Commission's rules to allow the requesting Voice over Internet Protocol ("VoIP") providers direct access to numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator.

¹*Wireline Competition Bureau Seek Comment on SmartEdgeNet, LLC and Millicorp, LLC Petitions for Limited Waiver of Commission's Rules Regarding Access to Telephone Numbers, Pleading Cycle Established*, Public Notice, CC Docket No. 99-200, DA 12-633 (April 24, 2012) ("*Public Notice*").

I. SUMMARY

The Petitions filed by Millicorp and SEN follow in the wake of a long list of similar petitions filed by Vonage and other petitioners in the seven years since the Commission granted a waiver to SBC Internet Services, Inc. (“SBCIS”).² While the Commission previously granted an interim waiver to an affiliate of a major carrier in anticipation of the Commission conducting a comprehensive review of the issue in a rulemaking proceeding, seven years have passed, and Petitioners and other providers are now attempting to expand the number of waivers granted without the critical operational, legal, and regulatory issues being addressed in a comprehensive rulemaking. The plain fact remains that these Petitioners, like the previous ones, and perhaps even more so, cannot meet the legal standard for a waiver of the Commission’s rules. The same issues that plague prior petitions—issues relating to number exhaust, routing, intercarrier compensation, and interconnection—have not been addressed by these or previous petitioners. The Commission should therefore conduct a rulemaking to address these issues in a comprehensive manner.

II. PETITIONERS HAVE NOT MET THE LEGAL STANDARD TO OBTAIN A WAIVER

A. Petitioners Have Not Met Their Heavy Burden to Show That Special Circumstances Warrant a Deviation from the Commission’s Rules

The Petitioners face the same “heavy burden” as other petitioners to obtain a waiver of the Commission’s rules:

The Commission may waive its rules when good cause is demonstrated. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. In doing so, the Commission

²*In the Matter of Administration of the North American Numbering Plan*, CC Docket 99-200, Order, CC Docket 99-200 (rel. Feb. 1, 2005) (“SBCIS Waiver Order”).

may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. Commission rules are presumed valid, however, and ***an applicant for waiver bears a heavy burden***. Waiver of the Commission's rules is therefore appropriate ***only if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest***.³

The Petitioners have not met the “heavy burden” that must be met to waive the Commission’s rules. As discussed at greater length in Section III, granting the Petitions is not in the public interest, because many unanswered questions persist about the impact of new waivers on, *inter alia*, number exhaust, interconnection, and intercarrier compensation.

In addition, neither of the Petitioners has demonstrated that “special circumstances” warrant a deviation from the general rule, nor that such a deviation would serve the public interest. There are no “special circumstances” that warrant a deviation from today’s rule that only carriers can obtain numbering resources. The Petitioners offer no unique circumstances that set them apart from the literally hundreds of other VoIP providers that have chosen not to become carriers. Indeed, the Petitioners candidly admit that any VoIP provider who requests a waiver from the Commission’s rules should be granted one: “SEN believes it (and any other identically situated VoIP provider) readily qualifies for a waiver of Section 52.15(g)(2)(i).”⁴ SEN also points to the “special circumstance” that it would have to partner with a local exchange carrier in order to obtain phone numbers.⁵ But this ostensible “special circumstance” proves too

³ *Id.*, ¶ 3 (citations omitted, emphasis added).

⁴ SEN Petition at 5.

⁵ *Id.* at 4.

much: every non-certificated, non-carrier VoIP provider must partner with a LEC to obtain phone numbers today.⁶

Petitioners also focus on their desire to obtain wholesale interconnection with the PSTN, but ignore the fact that Joint Commenters and other providers have, over the last seven years, developed a wide variety of wholesale products to provide interconnection to the PSTN. Petitioners also make certain claims relating to their “special circumstances” that can be misleading. Millicorp claims that is required to purchase PRI services in order to obtain numbering resources today,⁷ but in fact PRIs are not necessary to obtain phone numbers on a wholesale basis. SEN, in turn, complains that it will be required to “remove VoIP from its lexicon of services and effectively be shut out of the competitive marketplace.”⁸ Yet it is indisputable that both carriers and VoIP providers alike can offer IP-enabled services to their customers, and how they obtain phone numbers has no bearing on their ability to market such services.

In reality, SEN and Millicorp, as opposed to facing “special circumstances, face the same circumstances as every other other provider in the marketplace: they can decide to become a carrier, go through the routine state certification process, and obtain numbers directly, or they

⁶ Petitioners also claim to be similarly situated with SBCIS and therefore entitled to the same relief. *See* Millicorp Petition at 5; SEN Petition at 2. Petitioners, however, are in many respects very different from SBCIS in material respects, and there is therefore no basis to extend the same special treatment to these or any other providers at this time. One notable distinction is that SBCIS is affiliated with a well-known carrier, now AT&T. The lack of any carrier affiliation presents unique and serious issues for carriers, state regulators, industry representatives, and others attempting to do business with and interface with Petitioners. Other carriers at least have points of contact with AT&T, and a certificated entity that can be contacted and potentially held responsible if there are carrier-to-carrier payment, operational, or routing disputes. Likewise, a state commission seeking to reach out to SBCIS would have a means to obtain the appropriate contacts through AT&T, but no similar means to contact key personnel at these much lesser known, non-certificated companies.

⁷ Millicorp Petition at 3.

⁸ SEN Petition at 4.

can remain non-certificated and obtain numbers through a certificated carrier. If the Commission were to permit non-certificated carriers to obtain numbers directly, it would be discriminatory as to those carriers that have invested the resources necessary to become certificated carriers and act in accordance with the obligations imposed on carriers. If the Commission intends effectively to change the existing numbering rules by opening the floodgates to any waiver petitioner, it should move forward with a comprehensive rulemaking to establish clearly defined circumstances under which non-carriers may directly obtain telephone numbers.

B. Because the SBCIS Waiver Was Never Intended to Be Permanent, the Commission and Standard Setting Bodies Require a Rulemaking To Implement a Potentially Far-Reaching Rule Revision

If the Commission determines that non-carriers should be permitted to obtain number resources directly, such a far-reaching rule change must be addressed in a rulemaking proceeding. If anything, there is less reason today to grant any waiver petition. The SBCIS waiver was granted seven years ago and was to be valid only “until the Commission adopts final numbering rules regarding IP-enabled services.”⁹ It was clearly intended as an interim Commission solution for a brief period until the Commission could conduct a comprehensive, generally applicable review of its numbering rules as they relate to IP-enabled providers.¹⁰ Instead, since that time, the Commission has emphasized the importance of issuing numbers only to carriers. In 2007, the Commission, in establishing VoIP local number portability (“LNP”) requirements, reiterated that VoIP providers “may not obtain numbering resources directly from the NANPA because they will not have obtained a license or a certificate of public convenience

⁹ *SBCIS Waiver Order*, ¶ 11.

¹⁰ The D.C. Circuit has endorsed a rule of reason as to how long an agency can operate under interim rules. *See, e.g., In re Core Comm’ns, Inc.*, 531 F.3d 849, 855-859 (D.C. Cir. 2008).

and necessity from the relevant states.”¹¹ Instead of urging the Commission to accelerate its rulemaking proceeding, which is the logical next step, the Petitioners, like other petitioners, encourage the Commission to extend this ad hoc interim regime: “Millicorp requests for the waiver to remain in effect until the Commission adopts final numbering rules applicable to IP-enabled services through a proceeding of general applicability.”¹²

The Commission cannot proceed in this ad hoc manner because there is significant work to be completed before any additional non-carriers obtain numbers. In addition to clarifying the application of baseline regulatory and legal rules, as discussed further below and in the previous filings of Joint Commenters, critical work remains to be done by industry standards-setting bodies. For example, at the request of the North American Numbering Committee (“NANC”) in 2005, the ATIS Industry Numbering Committee (“INC”) reviewed the NANC’s July 2005 report¹³ and began crafting changes to relevant sections within four INC documents that may require modifications should the FCC issue an order addressing VoIP provider access to numbers. In June 2008, however, given that the impetus towards issuing numbers to VoIP providers had subsided, the Industry Number Committee tabled this issue until further action is taken by the FCC.¹⁴ As such, the recommended changes were never made. The only sensible means to restart this process would be through a rulemaking proceeding, providing sufficient time frames for the INC and other industry bodies to complete these revisions.

¹¹*Telephone Number Requirements for IP-Enabled Services Providers et al.*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, WC Docket Nos. 07-243, 07-244 and 04-36, CC Docket Nos. 95-116 and 99-200, at ¶ 20 (rel. Nov. 8, 2007) (“*VoIP LNP Order*”).

¹² Millicorp Petition at 2. *See also*, SEN Petition at 2.

¹³ *VoIP Service Providers’ Access Requirements for NANP Resource Assignments – NANC Report and Recommendation by the Future of Numbering Working Group* (July 2005).

¹⁴ ATIS INC Report to the NANC, at 3 (Mar. 29, 2012), attached hereto as Appendix A.

In part due to these requirements, NARUC has recently issued a resolution urging the Commission “to issue a Notice of Proposed Rulemaking to address the waiver requests by VoIP and IP-enabled service providers,” and not to grant further waivers “unless it first proceeds with a Notice of Proposed Rulemaking” NARUC also cited concerns relating to number exhaust, call routing, consumer protection capabilities, and uncertainty relating to interconnection and compensation obligations.¹⁵ Accordingly, the Commission should not create additional uncertainty in the industry by granting additional waivers without first conducting a rulemaking as recommended by NARUC, among others.

C. Granting the Petitions Would Not be in the Public Interest Because There is Minimal Public Information On Petitioners and There is No Federal Process to Parallel State Certification

We know very little about SEN and Millicorp from their Petitions. Neither company lists a legal or regulatory representative on its website, nor does either company post contacts for regulatory, 911, operational, or other issues. *See* <http://www.smartedgenet.com> and www.millicorp.com. Neither company has provided any significant background information to the Commission and the public in its waiver filing. SEN indicates on its site that it offers “a disruptive technological approach,” a statement with which Joint Commenters might agree, but remarkably little additional information. *See* <http://www.smartedgenet.com>.

This lack of publicly available information is exacerbated by the fact that neither SEN nor Millicorp has obtained state certifications. Joint Commenters have highlighted the fact in past filings that the state certification process provides critical company contacts to the state

¹⁵ *See* NARUC Request for a Rulemaking, CC Docket 99-200 (filed March 30, 2012), and attached Appendix, NARUC *Resolution Concerning Access to Numbering Resources and Adherence to Numbering Rules by Voice over Internet Protocol and IP-Enabled Service Providers* (Feb. 8, 2012) (“NARUC Resolution”).

commissions and throughout the industry.¹⁶ Although each state has its own requirements, in order to become certificated, carriers must demonstrate that they have adequate financing, as well as the managerial and technical expertise required to operate complex networks. State commissions inquire into whether a carrier or its management had previous compliance or bankruptcy issues in other states, or with previous companies. Importantly, state commissions also obtain critical corporate contact information for corporate personnel who are qualified to address issues relating to regulatory requirements, compliance, 911, and law enforcement (*e.g.*, CALEA), and require that such information be kept current. The state certification process serves a critical role in protecting the public interest. SEN and Millicorp may be qualified, but there is no evidence in their petitions to provide any of the information routinely provided to the state commissions during the state certification process. Joint Commenters urge the Commission, if it intends to allow non-carriers to obtain numbers, to conduct a rulemaking that would include an examination of what federal registration or certification requirements are necessary if the Commission intends to supplant the state commission certification role.

D. Millicorp's Request for Bureau Approval Does Not Meet the Legal Standard

Millicorp's petition raises unique issues in that it is addressed to the Chief of the Wireline Competition Bureau and represents a request for waiver approval by the Wireline Competition Bureau, as opposed to by the Commission. Joint Commenters have addressed the fact that these waivers do not fit within the category of rule waivers that could legally be granted by the Bureau.¹⁷ Pursuant to the limitations on the Bureau's authority in the Commission's rules, the

¹⁶ See Letter from James C. Falvey, Counsel to Joint Commenters, to Ms. Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200 (April 13, 2012) ("*Joint Commenters' April 13 Ex Parte*").

¹⁷ See Letter from James C. Falvey, Counsel to Joint Commenters, to Ms. Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200 (May 3, 2012) ("*Joint Commenters' May 3 Ex Parte*").

Bureau does “not have authority to act on any applications or requests which present novel questions of fact, law, or policy which cannot be resolved under outstanding precedents and guidelines.”¹⁸

There is no question that the Petitions raise novel questions of fact, law, and policy which cannot be resolved under outstanding precedent. As discussed above, the Petitioners bear no resemblance to AT&T, the nation’s largest carrier, whose affiliate SBC Internet Services, Inc. (SBCIS) received an interim waiver of the Commission’s rules in 2005. The SBCIS waiver was granted over seven years ago and was granted to the affiliate of an existing carrier. Moreover, none of the issues relating to number exhaust, number pooling, interconnection, and intercarrier compensation, among others, have been addressed by the Commission in the intervening seven years.

The Commission’s SBCIS waiver was supposed to be an interim waiver “until the Commission adopts final numbering rules regarding IP-enabled services.”¹⁹ Seven years is already too long a time to continue an interim waiver. It would merely exacerbate the issue to extend this “interim” waiver to other providers before the Commission adopts final numbering rules regarding IP-enabled services, and addresses the related issues raised by a variety of parties in this proceeding.²⁰

There is a broad consensus across a wide variety of parties that there are complex issues at stake in these waivers that represent novel issues of fact, law and policy. Joint Commenters have already mentioned that NARUC, representing the state commissions, has issued a 3-page

¹⁸ 47 C.F.R. § 0.291.

¹⁹ *SBCIS Order*, ¶ 11.

²⁰ *See supra* fn. 4.

resolution listing the many novel issues that are implicated by this proceeding: “There is currently no consistent or stated FCC rule or policy regarding the assignment of numbers to unlicensed or non-certificated service providers”²¹ The *NARUC Resolution* pointed to a series of complex and novel issues implicated by the waiver petitions that it considered required further review, and urged the Commission “to issue a Notice of Proposed Rulemaking to address the waiver requests by VoIP and IP-enabled service providers, in CC Docket No. 99-200, in order to proceed in a non-discriminatory manner”²² In addition to NARUC and the COMPTEL, NTCA, representing nearly 600 rural telecom providers, and NCTA, representing cable companies serving more than 90% of the nation’s cable television households, have urged the Commission to review the many novel and complex legal and factual issues presented by the waivers in an NPRM before considering the waivers pending in this proceeding.²³ As such, neither the waiver petition of Millicorp, nor other petitions pending in this proceeding, could legally be granted by Bureau action. In fact, a wide spectrum of industry participants urge the Commission to proceed deliberately and with appropriate public interest safeguards through an NPRM.

²¹ *NARUC Resolution* at 2.

²² *Id.* at 3.

²³ *In the Matter of Numbering Resource Optimization*, CC Docket 99-200, Comments of the National Telecommunications Cooperative Association in Response to Public Notice Seeking to Refresh Record, CC Docket 99-200 (Jan. 25, 2012) (“*NTCA January 25 Comments*”); *In the Matter of Petitions for Waiver of Commission’s Rules Regarding Access to Numbering Resources*, CC Docket 99-200, Comments of National Cable & Telecommunications Association (Jan. 25, 2012).

III. GRANTING THE PETITIONS WOULD NOT SERVE THE PUBLIC INTEREST BECAUSE THEY WOULD LEAD TO DISCRIMINATION, NUMBER EXHAUST AND OTHER REGULATORY BREAKDOWNS

Joint Commenters have already provided extensive input in this proceeding as to the many operational, legal and regulatory complications associated with granting one or more waivers. Joint Commenters previous arguments against other pending petitions apply with equal force to the Petitioners' filings.²⁴ Joint Commenters have raised a series of issues relating to number exhaust, routing, interconnection, and intercarrier compensation, and many critical questions remain unanswered. Joint Commenters will not repeat here all of the arguments made in their previous comments, but will instead highlight some of the more salient complications raised by the Petitions.

Granting these Petitions or other pending petitions is fundamentally unfair and discriminatory as to existing carriers, which have duly complied with existing regulations. If the Commission were to opt to grant a single waiver but not others, it would be discriminating in favor of one company. If it were to grant multiple waivers, each with their own unique terms and conditions, the Commission would sew confusion within the industry, and create a separate problem of tracking and enforcing multiple, unique sets of conditions. By proceeding by rulemaking, however, the Commission will ensure that all providers are treated equally and that all operational and regulatory issues are addressed in a comprehensive manner.

²⁴ See, e.g., *In the Matter of Vonage Holdings Corp. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources*, CC Docket 99-200, Comments of Bandwidth.com, Hypercube, LLC, Level 3 Communications, LLC, Pac-West Telecomm, Inc., and COMPTTEL (Jan. 25, 2012) ("*Joint Commenters' January 25 Comments*"); *In the Matter of Petitions for Waiver of Commission's Rules Regarding Access to Numbering Resources*, Letter from James C. Falvey, Counsel to Joint Commenters, to Marlene H. Dortch, Secretary, FCC (May 3, 2012); *Joint Commenters' April 13 Ex Parte*; and *Joint Commenters' May 3 Ex Parte*.

Notably, Joint Commenters, NARUC, and others have raised the issue of number exhaust, and the impact of multiple VoIP providers obtaining new NXX codes, particularly where a VoIP provider intends to obtain an LRN.²⁵ No waiver petitioner has explained why granting the pending petitions, as well as follow-on petitions, would not aggravate number exhaust concerns. Joint Commenters and others have raised a series of questions relating to the legal classification of interconnection agreements entered into by petitioners.²⁶ If a carrier such as one of the Joint Commenters enters into an interconnection agreement with an incumbent local exchange carrier, Section 251(c) requires, *inter alia*, that the agreement be filed with the state commissions.²⁷ This integral requirement of the Telecom Act ensures that incumbents will not discriminate as between smaller carriers, picking and choosing who they'll do business with and, potentially, who will succeed or fail. Again, no petitioner has addressed this question in this proceeding.

Joint Commenters have also raised serious concerns that waiver petitioners will utilize carrier switching and transport facilities to terminate their traffic, but not commit to the payment of the same intercarrier compensation that carriers pay today.²⁸ The SEN Petition raises further warning signs for Joint Commenters on this issue. SEN admits outright that it has no intention of paying any intercarrier compensation: "SEN does not intend to participate in any intercarrier compensation arrangement, as such responsibility will rest with the telecommunications carrier with which SEN will associate itself." SEN Petition, at 6. Of course, there is a high likelihood,

²⁵ *Joint Commenters' January 25 Comments*, at 10-11.

²⁶ *Id.* at 12-13; *NTCA's January 25 Comments*, at 9-10.

²⁷ 47 U.S.C. § 251(c), § 252(e).

²⁸ *Joint Commenters' January 25 Comments*, at 13.

absent clarification in a rulemaking proceeding, that many carriers will claim that they have no such obligation to pay compensation for traffic originating from numbers assigned to SEN or another VoIP provider. This presents Joint Commenters with the very shell game they have previously identified as a serious problem: neither the VoIP provider nor the carrier steps up to its obligation to make payment, and traffic must be terminated free of charge. Intercarrier compensation will continue to be exchanged for years to come, yet no petitioner has addressed the fundamental question of which party is legally obligated to make payment. These and other questions are too important to the smooth functioning of the industry to continue to go unanswered. A rulemaking proceeding is the only way to provide unambiguous, equitable, and nondiscriminatory answers to these critical industry issues.

IV. CONCLUSION

Joint Commenters urge the Commission to deny the additional Petitions of Millicorp and SEN because the Petitioners have not met their “heavy burden” to justify waiver of the Commission’s rules. There are no “special circumstances” that warrant a waiver of the Commission’s rules, and in fact, Petitioners advocate granting a similar waiver to any other VoIP provider making a similar request. Seven years have passed since the Commission’s interim waiver was issued to SBCIS and the Commission should first complete a comprehensive rulemaking proceeding, as it committed to in 2005, before granting any further waivers. Given the discriminatory impact, and the still unanswered questions relating to number exhaust, interconnection, and intercarrier compensation, among others, granting the pending petitions would not be in the public interest. Moreover, Joint Commenters have demonstrated that Bureau action on any petition would present questions of fact, law, or policy which cannot be resolved

under outstanding precedents and guidelines, and would therefore be beyond the Bureau's authority.

Joint Commenters urge the Commission to conduct a rulemaking proceeding, or make further progress in existing rulemakings, to address the issues raised herein.

Respectfully Submitted,

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Dated: May 8, 2012

Attachment A



Industry Numbering Committee (INC) Report to the NANC

March 29, 2012

Natalie McNamer, INC Chair
Dana Crandall, INC Vice Chair



INC Meetings

- INC Meetings: INC held one face-to-face meeting since the last NANC report.
 - Next INC Meeting: Week of April 16, 2012 (Bellevue, WA)
- Details on all future meetings can be found at:
www.atis.org/inc/calendar.asp



Issue 497: Identify Potential Changes to INC Guidelines Based on NANC's Report and Recommendation

- The FCC issued Public Notice DA 11-2074 on December 27, 2011, asking for a refresh of the record on numerous petitions for limited waiver of section 52.15(g)(2)(i) of the Commission's rules to allow the requesting VoIP providers direct access to number resources from the NANPA and PA.
- At NANC's request in 2005, INC reviewed the NANC's report (VoIP Service Providers' Access Requirements for NANP Resource Assignments – NANC Report and Recommendation by the Future of Numbering Working Group – July 2005) and crafted changes to relevant sections within four INC documents that may require modifications should the FCC issue an order addressing VoIP provider access to numbers.
- In June 2008, INC tabled this Issue until action is taken by the FCC.
- If the FCC adopts new numbering rules regarding VoIP provider access to numbers, INC will resume work on this issue.

INC Report to the NANC
March 29, 2012

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Issue 715: Update TBPAG For Retrieving a Block Donated/Returned in Error

- Issue 715 was accepted to evaluate and revise current processes for retrieving a block from the pool when a service provider either donates or returns a block in error.
- There was no documented process in the Pooling Guidelines for SPs to retrieve an over-contaminated block returned in error, but the process was documented in the PAS User Guide.
- When the block return could not be cancelled, SPs could use the "state waiver" button to process the application to retrieve an over-contaminated block returned in error.
- INC agreed to add a new "over-contaminated block exception" button in PAS for SPs to retrieve that block when the return could not be cancelled.
- The new button ensures that block applicants are not certifying that they have received a state waiver when retrieving an over-contaminated block returned in error.
- This issue is now in initial closure and will generate a PA change order.

INC Report to the NANC
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Issues in Initial Closure

- Issue 715: Update TBPAG For Retrieving a Block Donated/Returned in Error

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Issues in Initial Pending

- Issue 698: Auto-Populate Total Numbering Resources on TBPAG MTE Form
- Issue 710: NANC Action Item “multi-OCN Issue”

INC Report to the NANC
March 29, 2012

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Issues in Final Closure

- Issue 722: Review and Reconcile TN Administration Guidelines with Updated NANC LNP Flows
- Issue 724: Update Section 4.1 of Thousands-Block Number Pooling Administration Guidelines for LRN Clarification
- Issue 725: Update the p-ANI Guidelines Appendix 1 and Appendix 2 forms
- Issue 727: Effective Date Changes Not Allowed More Than 6 Months After Application Date



Relevant INC Web Pages

- INC Homepage (front page to all INC links):
<http://www.atis.org/inc/index.asp>
- INC Calendar (future meeting logistics/agendas):
<http://www.atis.org/inc/calendar.asp>
- INC Issues (historical and active):
<http://www.atis.org/inc/incissue.asp>
- INC Meeting Records:
http://www.atis.org/inc/mtgs_current.asp
- INC Published Documents:
<http://www.atis.org/inc/incguides.asp>