



Federal Communications Commission
Washington, D.C. 20554

December 7, 2017

The Honorable Travis Kavulla
Commissioner, Montana Public Service Commission
Chair, North American Numbering Council (NANC)
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Re: Nationwide Number Portability

Dear Chairman Kavulla:

As you are aware, the Commission has issued a Notice of Inquiry (NOI) and Notice of Proposed Rulemaking (NPRM) seeking to remove barriers to a nationwide number portability (NNP) system. The NOI/NPRM builds upon the much-appreciated prior work of the NANC¹ and the Alliance for Telecommunications Industry Solutions (ATIS).² It seeks comment on the best ways that the industry, the Commission, and other stakeholders can develop a number portability system that allows numbers to be ported from anywhere in the country to anywhere else.

The NOI discusses, in particular, four models for NNP: (1) nationwide implementation of Location Routing Numbers (LRNs); (2) non-geographic LRNs; (3) commercial agreements; and (4) iconectiv's GR-2982-CORE specification. The Bureau is interested in furthering progress towards nationwide number portability via the most promising of these models. With the additional technical background and assessments provided in the ATIS report, we believe that the NANC – in particular, the Nationwide Number Portability Issues Working Group – is well-suited to refine and develop recommendations for achieving this goal. Thus, we direct the NANC to:

- Determine whether any of the four models discussed in the NOI are preferable to others in terms of feasibility, cost, and adaptability to changing markets and technologies;
- Specify in detail the potential costs, benefits, and barriers to implementing each of these proposals;
- Identify any likely consequences of these proposals for routing, interconnection, or public safety;
- Recommend next steps to advance full nationwide number portability; and
- Make any other recommendations it deems necessary to achieve this goal.

We further direct the NANC to approve a written report on its findings on these issues, and to transmit that report to the Wireline Competition Bureau (Bureau) within four months of the date of this letter. If you have questions about the Bureau's referral, please contact Marilyn Jones, the NANC's Designated Federal Officer, by telephone at (202) 418-2357, or by email at marilyn.jones@fcc.gov.

¹ North American Numbering Council, Local Number Portability Administration Working Group, *White Paper on Non-Geographic Number Portability* (August 30, 2016).

² Alliance for Telecomm. Indus. Sols., *ATIS Standard – ATIS-1000071, Technical Report on a Nationwide Number Portability Study*, (2016).

In the meantime, thank you for your ongoing work to encourage a competitive and efficient number portability system that benefits consumers and all providers.

Sincerely,



Kris Anne Monteith

Chief

Wireline Competition Bureau, FCC