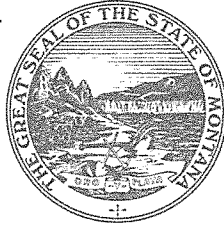# Montana Public Service Commission

Travis Kavulla - Vice Chairman
District 1

Apr. 9, 2018

Kris Monteith
Chief, Wireline Competition Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: Progress Report of the North American Numbering Council (NANC) on Issue-Specific Work Groups

Dear Ms. Monteith:

I am pleased to offer this letter in fulfillment of your February 22, 2018, request for a report on the progress of the Call Authentication Trust Anchor (CATA), Nationwide Number Portability (NNP), and Toll Free Assignment Modernization (TFAM)[1] working groups of the NANC.

Each working group submitted a detailed work plan to the NANC's leadership team, which are contoured to the May 7, 2018 deadline for the NANC's submission of the *Report on Call Authentication Trust Anchor: Governance and Timely Deployment* and the June 7, 2018, deadlines for the *Report on Nationwide Number Portability* and the *Report on Toll Free Assignment Modernization*.

The working groups have followed a robust process of information collection and deliberation. CATA, NNP, and TFAM have met weekly by teleconference, and the work of NNP and TFAM has further been separated into sub-topics, which has allowed smaller groups to develop initial positions for the consideration of the full working group. The working groups reported their progress to the NANC at its March 16, 2018, meeting.

The full NANC will deliberate on final draft reports of the CATA at its Apr 27, 2018, teleconference meeting, and the NNP and TFAM at its May 29, 2018, in-person meeting. These meetings have already been the subject of a public notice.[2] In order to fulfill the NANC's mandate that its reports be the product of deliberations by the full advisory committee, I have established deadlines for the working groups that their near-final drafts be submitted to the full

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[1] Also known as the Toll Free Number Modernization working group.
[2] *FCC Announces April and May Meetings of the North American Numbering Council*, CC Docket No. 92-237, Public Notice, DA 18-321 (March 30, 2018).

membership of the NANC at least a full working week prior to the NANC meetings at which advisory committee members will deliberate on the reports. As such, the coming NANC meetings will provide an important opportunity for all NANC members to ask questions of the working groups' leadership and to vet any remaining issues where consensus has not been achieved.

Accordingly, I anticipate at the present time that each of the working groups will comprehensively address each of the issues identified in their scope of work, and that they will produce drafts of reports which, after the full NANC's deliberation on them, will be transmitted to you on or before their respective deadlines.

To provide greater transparency into the efforts of each of the working groups, I will detail each working group's progress in turn.

*Call Authentication Trust Anchor Working Group*

The CATA is focused on the twin policy goals of expediency and broad participation in a new call authentication framework. As such, the CATA is focused on determining the best model for establishing the Governance Administrator (GA) in such a way that will accomplish these goals.

The CATA is on schedule to submit its near-final draft report to the NANC on April 19, 2018. Its work has been organized through an online portal of ATIS, where each member of the working group is invited to make written contributions relative to an evolving baseline document that will eventually become the report. These contributions are then presented in the working group's weekly teleconference, and deliberations around the evolving baseline document are held.

The working group's members have reached consensus that the industry should be responsible for standing up the GA such that it can be accomplished in the very near term, without the need for a more formal administrative proceeding. The working group, however, does believe the Commission's endorsement of the model is important. The CATA has discussed the possibility of the Commission's issuance of request for proposals for GA, but there was strong opposition to this concept.

There continues to be differing opinions as to who should be represented on the decisional board of the GA. There appears to be general agreement about the desire for broad representation and that cost should not be a barrier to participation. The CATA has also discussed the possibility of consumer group representation. At its coming teleconference, the CATA will further deliberate on which parties should be represented on the GA and what, if any, oversight the NANC should have over the GA.

In addition to its discussion of issues related to the GA, the evolving baseline document includes sections outlining the role and selection of a Policy Administrator (PA), as well as how industry actors might be incented toward and monitored for their progress to participating in the call authentication framework. Although a discussion surrounding the GA comprises the bulk of the evolving baseline document, it nevertheless considers each of the issues you have assigned the working group to address.

*Nationwide Number Portability Working Group*

The NNP is working toward a comprehensive analysis of what its members regard as the three plausible solutions to nationwide number portability: commercial agreements, non-geographic local routing numbers (LRNs), and nationwide implementation of LRNs.

The working group has concluded that the modifications to the SS7 signaling parameters that would be required to implement the GR-2982-CORE specification make it an inferior solution. It also seems unsupported by the majority of commenters in response to the Commission's 2017 notice of inquiry (NOI) and notice of proposed rulemaking (NPRM) on the topic.

Like TFAM, the NNP has sub-groups that are devoted to a more in-depth discussion of each of these three possible approaches, in order to ensure its draft report's discussion is robust. These sub-groups, then, inform the NNP's discussion on its weekly teleconference, which has lately expanded from one to two hours in duration.

*Toll Free Assignment Modernization Working Group*

Small groups of TFAM members have formed to address the three questions that you included in the December 7, 2018, scope of work. They intend to have initial positions on each of those topics routed back to the full TFAM by mid- to late April.

The small group responsible for addressing potential revisions to administrative rules codified at 47 CFR. § 52.101 *et. seq.* has made substantial progress in identifying rules that would need to be adjusted and in its upcoming meetings will begin to resolve how those rules might best be changed.
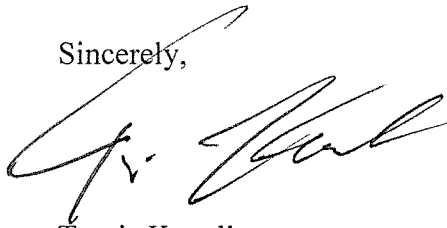
In considering a secondary market for toll-free numbers, the responsible small group has used the questions presented in the NPRM in FCC 17-124 (September 28, 2017), as a guide for its work. So far, they have addressed about half of the questions. Deliberations to date have generally supported the notion that the Brokering Prohibition should be adjusted to allow for the sale or transfer of a toll-free number when a business is sold, but not necessarily in other situations.

Finally, the small group responsible for initially addressing the topic of set-asides or reservation of certain toll-free numbers is still in fact-finding mode. They intend to address a number of questions to a representative of SOMOS to learn what kinds of abuse of the existing system may have happened to date, and to understand what the need for reform exists, and what structure it might take.

In conclusion, it is my impression that the working groups are making substantial progress on their assigned tasks. I would be remiss if I did not express my thanks for the extended deadlines which have made it possible for each working group to undertake a more robust deliberation of these issues. Except for what has been related above, at this point I foresee no major issues arising in the working groups' deliberations that would prevent the submission of detailed reports by the relevant deadlines.

Thank you for the opportunity to update you on the NANC's progress, and I am happy to answer any questions you may have.

Sincerely,

Travis Kavulla
Chair, North American Numbering Council

cc: NANC Working Group Chairs