



Public Service Commission of the District of Columbia
1333 H Street, N.W., 2nd Floor, West Tower
Washington, D.C. 20005
(202) 626-5100
www.dcpssc.org

Betty Ann Kane
Chairman

June 20, 2011

Ms. Sharon Gillett
Chief
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

RE: NANC Recommendation on Edits to the NRUF Guidelines to Address
Categorization of Numbers Subject to the Servicemembers Civil
Relief Act

Dear Ms. Gillett:

This is to advise the Federal Communications Commission that the North American Numbering Council ("NANC"), at its December 16, 2010 meeting, unanimously concurred with the recommendation of the Resource Assignment and Management Subcommittee, Industry Numbering Committee ("INC"), regarding "Edits to the Numbering Resource Utilization/Forecasting ("NRUF") Guidelines to Address Categorization of Numbers Subject to the Servicemembers Civil Relief Act ("SCRA")".

On October 13, 2010, the President signed the Veterans Benefits Act of 2010, increasing the scope of the existing Servicemembers Civil Relief Act of 2003.

Under the revised SCRA when a servicemember terminates a telephone service contract as a result of a military relocation and the servicemember's relocation is for three years or less, the service provider must retain the servicemember's telephone number in the event that this servicemember re-subscribes to the service during the 90 day period beginning on the last day of such period of relocation.

This retention of telephone numbers does not fit into any of the existing numbering category definitions used for NRUF reporting and for the months-to-exhaust utilization calculations so the issue was brought to the INC.

The INC has added text to the NRUF Guidelines indicating that although not an FCC-

designated subcategory of Assigned numbers, retained numbers complying with the SCRA shall be categorized as assigned numbers and tracked as a separate subcategory.

The INC also added a definition of "Numbers Retained per the Servicemembers Civil Relief Act" to the NRUF Guidelines Glossary. An advantage of using the Assigned numbers category for these numbers is that it protects the numbers from inadvertent reassignment or a snapback in a ported scenario.

Please feel free to contact me or the INC Chair, Natalie McNamer (natalie.mcnamer@T-Mobile.com) if you or members of your staff have any questions regarding this NANC recommendation.

Sincerely,

A handwritten signature in black ink, appearing to read "Betty Ann Kane". The signature is fluid and cursive, with a long horizontal stroke at the end.

Betty Ann Kane
Chairman
North American Numbering Council

cc: Ann Stevens, FCC
Marilyn Jones, FCC
NANC Members