

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

In the Matter of	)	
	)	
Rules and Policies Regarding Calling Number Identification Service – Caller ID	)	CC Docket No. 91-281
	)	
Petition of Chevrah Hatzalah Volunteer Ambulance Corps Inc. for Waiver of Section 1601(b) of the Commission’s Rules – Blocked Telephone Numbers	)	

**ORDER**

**Adopted: February 20, 2013**

**Released: February 20, 2013**

By the Acting Chief, Consumer and Governmental Affairs Bureau:

**I. INTRODUCTION**

1. In this Order, we grant a petition filed by the Chevrah Hatzalah Volunteer Ambulance Corps Inc. (Hatzalah),<sup>1</sup> requesting a limited waiver of section 64.1601(b) of the Commission’s rules, which prohibits terminating carriers from passing the calling party number (CPN)<sup>2</sup> to the called party where a privacy request has been made by the caller. Specifically, we conclude that granting this request, under the conditions specified herein, will better serve the public interest by allowing Hatzalah to identify and locate individuals seeking emergency services when the caller has blocked the transmission of CPN. We believe that the public interest in ensuring the timely provision of emergency services can be promoted in this instance by granting the requested waiver without undermining any countervailing privacy interests under the Commission’s rules.<sup>3</sup>

<sup>1</sup> See *Petition for Waiver of Chevrah Hatzalah Volunteer Ambulance Corps Inc.*, CC Docket No. 91-281, filed on Sept. 30, 2011 (Petition).

<sup>2</sup> The Commission’s rules define CPN as “the subscriber line number or the directory number contained in the calling party number parameter of the call set-up message associated with an interstate call on a Signaling System 7 network.” See 47 C.F.R. § 64.1600(e). Associated with the CPN is a Privacy Indicator “that indicates whether the calling party authorizes presentation of the calling party number to the called party.” See 47 C.F.R. § 64.1600(j).

<sup>3</sup> As discussed in further detail, this conclusion is consistent with the Commission’s rules, policies, and prior rulings relating to the delivery of CPN when a caller is requesting emergency services. See, e.g., 47 C.F.R. § 64.1601(d) (exempting from the prohibition on overriding the privacy indicator any CPN delivered that is “used on a public agency’s emergency telephone line or in conjunction with 911 emergency services, or on any entity’s emergency assistance poison control telephone line”); see also *Rules and Policies Regarding Calling Number Identification Service – Caller ID*, CC Docket No. 91-281, Report and Order and FNPRM, 9 FCC Rcd 1764 at 1770-71, para. 37 (1994) (*Caller ID Order*) (noting that blocking mechanisms may jeopardize emergency services that rely on caller ID and thus pose a serious threat to public safety and health).

## II. BACKGROUND

### A. The CPN Rules

2. In 1994, the Commission adopted rules that require common carriers using Signaling System 7 to transmit the CPN on interstate calls to interconnecting carriers.<sup>4</sup> The Commission concluded that passage of CPN over interstate facilities made possible a wide range of services, and that promoting the development of such services was consistent with the Commission's responsibilities under the Communications Act.<sup>5</sup> In particular, the Commission concluded that requiring CPN transmission would bring consumers more rapid and efficient service and encourage the introduction of new technologies and services to the public.<sup>6</sup>

3. At the same time, the Commission recognized that unrestricted CPN transmission could intrude upon the privacy of calling parties wishing to remain anonymous.<sup>7</sup> Therefore, the Commission established privacy options to allow callers to restrict the transmission of their telephone numbers.<sup>8</sup> For example, the Commission's rules require carriers using Signaling System 7 to recognize \*67 as a request that they not pass the calling party's number (per-call blocking).<sup>9</sup> In addition, carriers are permitted to provide privacy blocks on all calls dialed from a particular line (per-line blocking) where state policies allow, and the customer selects that option, provided the carriers permit callers to unblock calls from that line by dialing \*82.<sup>10</sup> Section 64.1601(b) provides that "[n]o common carrier subscribing to or offering any service that delivers CPN may override the privacy indicator associated with an interstate call."<sup>11</sup>

4. The Commission has concluded, however, that in certain limited circumstances, the public interest requires CPN transmission despite any countervailing privacy request from the calling party.<sup>12</sup> For example, the Commission has stated that, "[t]o the extent that CPN-based services are used to deliver

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<sup>4</sup> See *Caller ID Order*; see also 47 C.F.R. § 64.1601(a).

<sup>5</sup> *Caller ID Order*, 9 FCC Rcd at 1769, para. 34.

<sup>6</sup> *Id.* at 1766, para. 8.

<sup>7</sup> *Id.* at 1769, para. 34.

<sup>8</sup> See 47 C.F.R. § 64.1601(b); see also *Rules and Policies Regarding Calling Number Identification Service – Caller ID*, Memorandum Opinion and Order on Reconsideration, Second Report and Order and Third Notice of Proposed Rulemaking, CC Docket No. 91-281, 10 FCC Rcd 11700, 11728-29, paras. 81-84 (1995) (*Caller ID Reconsideration Order*).

<sup>9</sup> 47 C.F.R. § 64.1601(b).

<sup>10</sup> *Caller ID Reconsideration Order*, 10 FCC Rcd at 11728-29, paras. 81-84; see also 47 C.F.R. § 64.1601(b).

<sup>11</sup> 47 C.F.R. § 64.1601(b). In addition, section 64.1601(b) provides that, "[c]arriers must arrange their CPN-based services, and billing practices, in such a manner that when a caller requests that the CPN not be passed, a carrier may not reveal that caller's number or name, nor may the carrier use the number or name to allow the called party to contact the calling party."

<sup>12</sup> See 47 C.F.R. § 64.1601(d).

emergency services, we find that privacy requirements for CPN-based services should not apply to delivery of the CPN to a public agency's emergency line, a poison control line, or in conjunction with 911 emergency services."<sup>13</sup> In addition, the Commission has noted that "in an emergency, a caller is not likely to remember to dial or even to know to dial an unblocking code."<sup>14</sup>

## B. Hatzalah Petition

5. On September 30, 2011, Hatzalah filed a petition seeking a limited waiver of section 64.1601(b) of the rules governing the transmission of CPN by carriers on the terminating end of a call. Hatzalah, a non-profit corporation, operates an ambulance service of over 70 ambulances throughout the New York City metropolitan area and New York State that respond to emergency-related calls.<sup>15</sup> Hatzalah notes that it is the only non-governmental volunteer ambulance service in the country to be granted a Level C priority restoration designation from the U.S. Department of Homeland Security.<sup>16</sup> Category C priority is granted only to those services for which a telecommunications service interruption ranging from a few minutes to one day would have serious adverse impact on the supported National Service and Emergency Preparedness functions.<sup>17</sup>

6. Hatzalah indicates that it has developed a computer-aided dispatch system that provides dispatchers with instant caller identification and location for calls received from areas where it provides ambulance service.<sup>18</sup> This automatic data retrieval system eliminates the need for the dispatcher to obtain contact information from the caller, who may be unable to provide it due to the emergency that prompted the call. This system, however, is disrupted when the incoming call comes from a caller who has requested that his/her number not be revealed to the called party.<sup>19</sup> In this circumstance, Hatzalah states that the inability to automatically identify callers creates several problems that can delay or even prevent the timely provision of emergency care.<sup>20</sup> For example, without automatic data retrieval, time must be

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<sup>13</sup> *Caller ID Order* at 1770, para. 37; *see also* 47 C.F.R. § 64.1601(d)(4)(ii); *INSIGHT 100 Petition for Waiver of § 64.1601(b) Regarding the Transmission of Calling Party Number*, CC Docket No. 91-281, Memorandum Opinion and Order, 17 FCC Rcd 223 (CCB 2002) (*INSIGHT Order*) (waiving section 64.1601(b) on behalf of certain universities and hospitals).

<sup>14</sup> *Caller ID Order*, 9 FCC Rcd at 1771, para. 43.

<sup>15</sup> Petition at 1-2.

<sup>16</sup> *See* Letter from Russell H. Fox, Counsel for Hatzalah, to Marlene H. Dortch, FCC, dated June 15, 2012 in CC Docket 91-281 at 1 (Hatzalah June 15 *ex parte*); Hatzalah Reply Comments at 7; *see also* Letter from Senator Charles E. Schumer, to Julius Genachowski, Chairman, FCC, dated June 13, 2012 (noting that "[t]he service Hatzalah provides to New York is invaluable, and it is critical that they have all the tools they need to do their job.>").

<sup>17</sup> *See* Hatzalah Reply Comments at 7.

<sup>18</sup> Petition at 2.

<sup>19</sup> *Id.*

<sup>20</sup> *Id.* at 3. Hatzalah indicates that its typical response time is within two to four minutes of receiving a call and that adding even seconds to the response time to verify phone numbers and location information can delay critical emergency response times. *See* Hatzalah June 15 *ex parte* - Attachment at 2.

taken during the call to confirm the caller's telephone number and location. If the caller is unable to provide this information, Hatzalah states that it may be unable to obtain sufficient location information to respond to the emergency or call the party back if the call becomes disconnected.<sup>21</sup> Hatzalah indicates that the lack of caller ID information is more problematic for wireless callers than wireline callers.<sup>22</sup> Hatzalah notes that the Commission's rules contain an exemption that allows for CPN delivery to public safety answering points that provide 911 emergency services even when CPN blocking has been requested by the caller.<sup>23</sup> As a private not-for-profit entity, however, Hatzalah states that it does not qualify for that exemption, despite the fact that it claims to function in a similar capacity by providing emergency services to the public.<sup>24</sup>

7. Hatzalah contends that granting a waiver in this instance would satisfy the Commission's established waiver standards. Specifically, Hatzalah argues that the ability to identify and locate callers is paramount to the mission of emergency service providers, and strict adherence to the general rule in this case runs counter to the public's interest in receiving emergency medical attention in a timely manner.<sup>25</sup> In addition, Hatzalah indicates that deviation from the rule in this case will lead to more effective implementation of overall public safety policy by promoting the timely provision of emergency services.<sup>26</sup> It also notes that, while the Commission's CPN rule is designed to protect the privacy of callers that choose CPN blocking, waiver of the rule would not frustrate that purpose because the Commission has recognized that a caller's privacy interest should not interfere with the delivery of emergency services.<sup>27</sup> Finally, Hatzalah contends that the scope of the requested waiver is narrowly tailored to serve a specific public interest identified by the Commission because the waiver would apply only to Hatzalah and calls made to its dedicated emergency telephone lines.<sup>28</sup> If granted, Hatzalah commits to compliance with the following conditions that are relevant to its provision of emergency services and that are designed to protect CPN information: 1) CPN information will not be transmitted over the air; 2) CPN will be accessible by the dispatcher only for a limited time after providing service to a patient; 3) CPN will be retained in a secure, password-protected database; 4) CPN information will not be transmitted to third parties; 5) Hatzalah will comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) privacy obligations; and 6) Hatzalah will report any violations of

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<sup>21</sup> *Id.* at 3-4.

<sup>22</sup> *Id.* at 3.

<sup>23</sup> *Id.* at 2-3.

<sup>24</sup> *Id.* at 3.

<sup>25</sup> *Id.* at 5.

<sup>26</sup> *Id.* at 6 (citing an exemption for providers of emergency services contained in section 64.1601(d)(4)(ii) of the Commission's rules).

<sup>27</sup> *Id.* at 6-7.

<sup>28</sup> *Id.* at 7.

these conditions to the Commission.<sup>29</sup>

8. On February 14, 2012, the Consumer & Governmental Affairs Bureau released a Public Notice seeking comment on the issues raised in the Petition.<sup>30</sup> There were three comments and one reply comment filed in response to this Public Notice. Specifically, ZipDX suggests that Hatzalah acquire and publish a toll-free 800 number as the number to be called to reach the ambulance service in an emergency, noting that calling-party information can be revealed to 800 subscribers, regardless of the privacy indicator set by the caller.<sup>31</sup> A New York City paramedic, Danny Burstein, generally supports Hatzalah's petition, noting the positive impact of Hatzalah's service in the community and the importance of obtaining caller location information in emergency situations.<sup>32</sup> CenturyLink contends that Hatzalah's petition presents issues of general applicability better suited for a rulemaking proceeding.<sup>33</sup> CenturyLink argues that a waiver is not warranted every time the public interest would be better served by non-compliance with the rule and that Hatzalah has failed to differentiate itself from other private ambulance companies.<sup>34</sup> In reply, Hatzalah states that special circumstances exist that merit waiver of the rule. In particular, Hatzalah contends that it must be able to view a calling party's telephone number to ensure the provision of emergency services and that a caller to an emergency number generally has no expectation that his/her phone number would be kept private in that situation.<sup>35</sup> To the contrary, Hatzalah believes the caller has an interest in the number becoming known to the emergency provider to speed the provision of emergency services.<sup>36</sup> By virtue of the size and scope of services provided, Hatzalah notes that it is also different from virtually every private ambulance company in the country.<sup>37</sup> Finally, Hatzalah indicates that it has reviewed the possibility of using an 800 number and concluded that it is not a practical alternative because switching to an 800 number would create consumer confusion and result in many consumers not being able to reach the ambulance service.<sup>38</sup>

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<sup>29</sup> See Letter from Russell H. Fox, Counsel for Hatzalah, to Marlene H. Dortch, Secretary, FCC, dated July 24, 2012 in CC Docket No. 91-281.

<sup>30</sup> See *Consumer & Governmental Affairs Seeks Comment on Petition for Waiver of Chevrah Hatzalah Volunteer Ambulance Corps Inc. Regarding the Transmission of Calling Party Number*, Public Notice, CC Docket No. 91-281, 27 FCC Rcd 1583 (2012).

<sup>31</sup> ZipDX Comments at 1.

<sup>32</sup> Danny Burstein Comments at 1.

<sup>33</sup> CenturyLink Comments at 1.

<sup>34</sup> *Id.* at 3-7.

<sup>35</sup> Hatzalah Reply Comments at 5.

<sup>36</sup> *Id.* at 5-6.

<sup>37</sup> *Id.* at 6 (noting that it provides ambulance service every day at no cost in a geographic area that contains more than eight million people).

<sup>38</sup> *Id.* at 10.

### C. Waiver Standard

9. The Commission may waive any of its rules for good cause shown.<sup>39</sup> A waiver may be granted if: (1) the waiver would better serve the public interest than would application of the rule; and (2) special circumstances warrant a deviation from the general rule.<sup>40</sup> Circumstances that would justify a waiver include “considerations of hardship, equity, or more effective implementation of overall policy.”<sup>41</sup> Generally, the Commission may grant a waiver of its own rules if the relief requested would not undermine the policy objectives of the rule in question, and would otherwise serve the public interest.<sup>42</sup>

### III. DISCUSSION

10. We conclude that, subject to certain conditions, Hatzalah’s petition meets the standards for granting a limited waiver of section 64.1601(b), and such waiver would not undermine the privacy objectives of that rule.<sup>43</sup> We find here, as the Commission has previously, specific circumstances where the need to ensure public safety takes precedence over a caller’s interest in maintaining the privacy of his or her telephone number.<sup>44</sup> As noted above, for example, the Commission has found that “[t]o the extent that CPN-based services are used to deliver emergency services, we find that privacy requirements for CPN-based services should not apply to delivery of the CPN to a public agency’s emergency line, a poison control line, or in conjunction with 911 emergency services.”<sup>45</sup> In addition, we note that the Commission has found that the disclosure of caller ID does not violate any privacy rights protected by the U.S. Constitution.<sup>46</sup>

11. We grant Hatzalah’s request for a limited waiver subject to the conditions discussed below. First, we conclude that a limited waiver of section 64.1601(b) serves the public interest in this instance because Hatzalah will be better able to respond to emergency situations by saving the crucial time taken

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<sup>39</sup> 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969); *appeal after remand*, 459 F.2d 1203 (D.C. Cir. 1972), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990).

<sup>40</sup> *Northeast Cellular*, 897 F.2d at 1166.

<sup>41</sup> *WAIT Radio*, 418 F.2d at 1159.

<sup>42</sup> *Id.* at 1157.

<sup>43</sup> As mentioned above, *see supra* paras. 2-3, the requirement in section 64.1601(b) of our rules that carriers not override the privacy indicator applies only to interstate calls. *See* 47 C.F.R. § 64.1601(b) (“No common carrier subscribing to or offering any service that delivers CPN may override the privacy indicator associated with an interstate call.”). The record does not show, and we express no view on, what rules may apply to the delivery of CPN for intrastate calls in New York.

<sup>44</sup> *See, e.g., Caller ID Order*, 9 FCC Rcd at 1770, para. 37; *INSIGHT Order*, 17 FCC Rcd at 225-26, paras. 8-12; 47 C.F.R. § 64.1601(d).

<sup>45</sup> *Caller ID Order*, 9 FCC Rcd at 1770, para. 37.

<sup>46</sup> *Id.* at 1769, para. 30.

when requesting phone number and location information from the caller.<sup>47</sup> In addition, people seeking emergency services are often under great stress when they call, which can lead to difficulty in accurately communicating the vital telephone number and location information.<sup>48</sup> If the caller is unable to provide sufficient location information, Hatzalah may be unable to respond to the emergency request, potentially endangering the lives and safety of members of the public.<sup>49</sup> Further, when a CPN is unblocked, this allows the dispatcher immediately to return a disconnected call without asking for the phone number.<sup>50</sup> We also agree with Hatzalah that a caller seeking emergency services has an interest in the number becoming known to the emergency provider to speed the provision of emergency services and, therefore, any privacy concerns are minimized in this context.<sup>51</sup>

12. Second, we find that special circumstances warrant a deviation from the general rule. Hatzalah is the largest all-volunteer ambulance service in the United States, and it serves very unique and vital roles in New York.<sup>52</sup> For example, the record indicates that Hatzalah: 1) is the only volunteer ambulance company that has been assigned Category C TSP priority by the Federal Office of Priority Telecommunications; 2) provides specialized services to Holocaust survivors and Hassidic and Sabbath observant Jewish people—for whom the New York State Department of Health has acknowledged there is a significant need for Hatzalah’s services, and whom cannot be addressed by other existing services; 3) is the only volunteer ambulance service licensed to serve all of New York City.<sup>53</sup> Moreover, Hatzalah uses an established, well-known local telephone number for its emergency services, and believes that using an 800 number instead would lead to consumer confusion.<sup>54</sup> Because that number is so closely identified with an emergency service, callers also likely do not want or expect the usual privacy protections associated with CPN blocking for calls placed to that number. We agree with Hatzalah that changing its emergency response number to an 800 number to gain access to blocked caller ID information, as suggested by one commenter, would risk confusion among individuals seeking emergency services who are familiar with Hatzalah’s existing number for such services.<sup>55</sup> For example, Hatzalah notes that its main emergency hotline number has been “ingrained in the minds of millions of people for three generations.”<sup>56</sup>

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<sup>47</sup> *Petition* at 3.

<sup>48</sup> *Id.*

<sup>49</sup> *Id.* at 3-4.

<sup>50</sup> *Id.*

<sup>51</sup> Hatzalah Reply Comments at 5.

<sup>52</sup> *Petition* at 6.

<sup>53</sup> *Id.* at 6-7.

<sup>54</sup> *See* Hatzalah Reply Comments at 10.

<sup>55</sup> *See* ZipDX Comments at 1; *see also* Hatzalah Reply Comments at 10.

<sup>56</sup> *See* Hatzalah Reply Comments at 10 (noting that in many orthodox Jewish communities that children memorize Hatzalah’s emergency number simultaneously to learning to dial 911 and stickers advertising the emergency number can be found in thousands of homes).

13. We also reject the argument of one commenter that Hatzalah's petition's presents issues of general applicability better suited for a rulemaking proceeding.<sup>57</sup> To the contrary, because of these unique facts, we find it appropriate to grant a waiver that addresses the narrow and well-defined circumstances of Hatzalah's emergency services. The Commission's rules recognize that, in general, providers of emergency services should receive CPN delivery notwithstanding the privacy indicator.<sup>58</sup> That exception does not apply to Hatzalah because it is a private non-profit corporation rather than a public agency, but for reasons discussed here, we find that the purpose of the rule is better served by applying the exception in this instance, subject to the conditions discussed below. If we receive a large number of similar requests, however, the Bureau could recommend to the Commission that it consider initiating a rulemaking proceeding.

14. As discussed below, we also condition the approval of this waiver on implementation of several safeguards consistent with the privacy objectives of the CPN rules to protect the confidentiality of calling parties. In addition, we want to ensure that the waiver provides the emergency response benefits outlined in this Order as well as Hatzalah's Petition. Therefore, we require Hatzalah to monitor and report to the Commission whether and how this waiver has enhanced the ability of Hatzalah's dispatchers to respond to requests for emergency services. We require Hatzalah to file such reports in CC Docket No. 91-281 no later than six and 18 months after the release date of this Order. These reports will cover the periods from the release date of this Order until the reporting date.<sup>59</sup> We intend to monitor the results of this waiver, to inform us when considering any similar requests in the future.

15. *Conditions of Waiver.* The limited waiver granted herein is subject to the following conditions: 1) CPN information will not be transmitted over the air;<sup>60</sup> 2) CPN will be accessible by the dispatcher only for a limited time after providing service to a patient;<sup>61</sup> 3) CPN will be retained in a secure, password-protected database; 4) CPN information will be not be transmitted to third parties; 5) Hatzalah will comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) privacy obligations; 6) Hatzalah will promptly report any violations of these conditions to the Commission; and 7) Hatzalah will monitor and report on the effectiveness of this waiver for its provision

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<sup>57</sup> CenturyLink Comments at 1.

<sup>58</sup> See 47 C.F.R. § 64.1601(d)(4)(ii) (providing that the CPN delivery and privacy requirements shall not apply when CPN delivery "[i]s used on a public agency's emergency telephone line or in conjunction with 911 emergency services").

<sup>59</sup> Specifically, these reporting periods will cover the timeframes from zero-to-six and zero-to-18 months following the release date of this Order, respectively.

<sup>60</sup> Hatzalah notes that the information that is transmitted over the air to Hatzalah volunteers is limited and does not include CPN, even when that information is known to the dispatcher. If a Hatzalah volunteer needs to reach a patient, the volunteer notifies the dispatcher who then directly connects the volunteer to the calling party – the volunteer does not dial a patient's number. See Hatzalah July 24 *ex parte* at 1.

<sup>61</sup> Hatzalah indicates that the dispatcher only has access to the dispatch log, which contains CPN, while and immediately after a call is active; *i.e.*, while Hatzalah is providing patient service or is in the process of locating a patient. Once a call is concluded; *i.e.*, service has been rendered and Hatzalah's involvement is discontinued, the dispatcher only has access to the DL for a very limited time thereafter and then it is stored in Hatzalah's secure database. See Hatzalah July 24 *ex parte* at 2.



of emergency services as described in paragraph 14, above.<sup>62</sup>

16. The foregoing waiver conditions and security procedures for CPN use will serve the policies underlying section 64.1601(b), while allowing Hatzalah to respond more effectively to emergency situations. To the extent that there is any expectation of privacy when seeking emergency services, these conditions, to which Hatzalah has committed, will help address it. Accordingly, we find good cause to grant Hatzalah's petition for limited waiver to the extent described herein.

#### IV. ORDERING CLAUSES

17. Accordingly, IT IS ORDERED that, pursuant to sections 4(i) and 4(j) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), (j), and section 1.3 of the Commission's rules, 47 C.F.R. § 1.3, and the authority delegated in sections 0.141 and 0.361 of the rules, 47 C.F.R. §§ 0.141, 0.361, that the petition for limited waiver of section 64.1601(b) of the Commission's rules, 47 C.F.R. § 64.1601(b), filed by the Chevrah Hatzalah Volunteer Ambulance Corps, Inc., in CC Docket No. 91-281, IS GRANTED SUBJECT TO THE CONDITIONS DESCRIBED IN PARAGRAPHS 14 and 15 and as set forth herein.

18. IT IS FURTHER ORDERED that Hatzalah shall file reports in CC Docket No. 91-281 no later than six and 18 months after the release date of this Order demonstrating whether and how this waiver has enhanced the ability of its dispatchers to respond to requests for emergency services.

FEDERAL COMMUNICATIONS COMMISSION

Kris Anne Monteith  
Acting Chief  
Consumer and Governmental Affairs Bureau

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<sup>62</sup> We note that these conditions are consistent with those proposed by the petitioner and similar to those imposed in granting a waiver request for NASA. *See* Petition at 8; *see also Rules and Policies Regarding Calling Number Identification Service – Caller ID; Petition of National Aeronautics and Space Administration for Waiver of Federal Communication's Commission Regulation 47 C.F.R. § 64.1601(b)*, CC Docket No. 91-281, Order, 27 FCC Rcd 5704, 5709, para. 13 (2012).