



Public Service Commission of the District of Columbia

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Betty Ann Kane
Chairman

July 13, 2015

Mathew DelNero
Chief
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

RE: Hoarding of Non-Toll Free Numbers

Dear Mr. DelNero:

This is to advise the Federal Communications Commission that the North American Numbering Council ("NANC"), at its June 4, 2015 meeting, discussed the substance of a recent Washington Post news article regarding the brokering and sale to private entities of custom telephone numbers (See: "People are Paying Tens of Thousands of Dollars for Custom Phone Numbers. These Are the Most Expensive."; April 23, 2015; <http://www.washingtonpost.com/blogs/wonkblog/wp/2015/04/23/how-to-make-100000-by-selling-a-phone-number-on-the-internet/>).

During the NANC's discussion of this matter it became apparent to me that there may be an unintended limitation in the FCC's rules that appear to prohibit the hoarding of telephone numbers since the current rule (47 C.F.R. §52.107) only prohibits the hoarding of Toll Free Numbers by toll free number subscribers and does not apply to other telephone numbers that may be hoarded, including number brokering for sale for a fee to private entities (such as was described in the Washington Post article). I believe that the hoarding and/or the brokering for sale to private entities of any telephone numbers, Toll Free or Non-Toll Free, is an inefficient and inequitable management practice for the nation's limited numbering resources.

The NANC is directed to provide advice to the FCC regarding the efficient and impartial administration of telecommunications numbering and the management of numbering

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resources in order to make such numbers available on an equitable basis. Accordingly, I suggest that the Wireline Competition Bureau refer the issue of the hoarding and brokering for sale of Non-Toll Free Numbers to the NANC for further investigation and advice.

Please feel free to contact me or my Policy Advisor, Cary Hinton (chinton@psc.dc.gov), if you or members of your staff have any questions regarding this matter.

Sincerely,



Betty Ann Kane
Chairman
North American Numbering Council

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