



1212 New York Ave. N.W.  
Suite 900  
Washington, D.C. 20005  
202-525-5717

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Kris Anne Monteith  
Federal Communications Commission  
Washington, D.C. 20554

*By electronic mail*

**Re: Additional Findings Report on Nationwide Number Portability**

Ms. Monteith:

By this letter, I am transmitting the above-titled final report, which is responsive to your July 3, 2018 correspondence regarding the same.

As you know, the Nationwide Number Portability (NNP) Working Group has been evaluating issues concerning NNP since the Wireline Competition Bureau first referred to the NANC the topic in December 2017. Since that time, the NNP Working Group has reduced the choices essentially to two options: a National Local Routing Number (NLRN) or an Internet Protocol Local Routing Number (IPLRN).<sup>1</sup>

This choice depends on the trajectory of technological change in the industry. For example, an industry that comes to use IP to facilitate substantially all telephony could make IPLRN a relatively easy choice. The report does not reach a definitive conclusion of either of these options. However, the report identifies the commonalities in how calls are processed, and graphically represents these in an attachment to the report.

The report also does not conduct a comprehensive cost-benefit analysis. I regret to say that in this regard, despite the NNP WG's efforts, the NANC has still fallen short of the referral letter's mandate to the advisory committee. Part of the difficulty is that a net benefits analysis would have to make certain assumptions about the pace of various actors' technological change.

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<sup>1</sup> The IPLRN is the renamed Non-Geographic Local Routing Number, as described in the previous NANC report on this subject.

Additionally, putting aside the totality of costs and benefits, individual systems' costs and benefits under NNP are dependent upon the technologies and protocols they presently use for call routing; they also depend upon the commercial and regulatory relationship of one system to another. There may be further NNP-related work that the NNP Working Group could undertake, as the report suggests. However, there are also policy considerations that the Commission might weigh about a uniform NNP policy versus systems that are not today technologically homogeneous before it considers its next step on this policy item.

I want to thank the NNP Working Group and especially its technical subcommittee, which through many hours met, deliberated, and drafted the enclosed report. The report was adopted at our May 8, 2019 NANC meeting on a majority vote; a minority report is attached at the end of the written report. Although it has not reached a consensus position, I believe the report is worthwhile and hope you find it informative as you continue your review of NNP and related issues.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Travis Kavulla". The signature is fluid and cursive, with a large initial "T" and "K".

Travis Kavulla

Chairman, North American Numbering Council

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