

**North American Numbering Council
Meeting Minutes
Wednesday, May 8, 2019 (Final)**

I. Time and Place of Meeting. The North American Numbering Council Meeting (NANC) held a meeting commencing at 10:00 a.m., at the Federal Communications Commission, 445 12th Street, S.W., Room 5-B516, Washington, D.C. 20554.

II. List of Attendees.

Voting Council Members:

- | | |
|-----------------------------------|--------------------------------------|
| 1. Travis Kavulla | NANC Chairman (R Street Institute) |
| 2. Susan Gately | Ad Hoc Telecommunications Users Cmte |
| 3. George Guerra | AT&T |
| 4. Jacqueline Wohlgemuth | ATIS |
| 5. Greg Rogers | Bandwidth.com |
| 6. Betty Sanders | Charter Communications |
| 7. Beth Choroser | Comcast Corporation |
| 8. Courtney Neville | Competitive Carriers Association |
| 9. Benjamin Aron | CTIA |
| 10. Honorable Paul Kjellander | NARUC - ID |
| 11. Honorable Karen Peterson | NARUC - MA |
| 12. Jerome Candelaria | NCTA |
| 13. Brian Ford | NTCA |
| 14. Julie Oost | Peerless Network |
| 15. Richard Shockey | SIP Forum |
| 16. Shaunna Forshee | Sprint |
| 17. Paul Nejedlo | TDS Telecommunications |
| 18. David Casem | Telnyx |
| 19. Bridget Alexander White | USConnect |
| 20. Mike Saperstein | USTelecom |
| 21. Dana Crandall | Verizon |
| 22. Robert McCausland | West Telecom Services |
| 23. Professor Henning Schulzrinne | |

Special Members (Non-voting):

Chris Drake	iconectiv
Ann Berkowitz	Somos

Commission Employees:

Marilyn Jones, Designated Federal Officer (DFO)
Michelle Sclater, Alternate DFO

Kris Monteith, Chief, Wireline Competition Bureau (WCB)
Eric Burger, FCC Chief Technology Officer, Office of Economics and Analytics (OEA)
Pam Arluk, Chief, Competition Policy Division (CPD), WCB
Ann Stevens, Deputy Chief, CPD, WCB
William Andrlle, Attorney-Advisor, CPD, WCB
Zachary Ross, Attorney-Advisor, CPD, WCB
Celia Lewis, Attorney-Advisor, CPD, WCB
Nellie Foosaner, Attorney-Advisor, Policy and Licensing Division, Public Safety and Homeland Security Bureau
Myrva Charles, Contracting Officer Representative, CPD, WCB
Darlene Bidy, Management Analyst, CPD, WCB
Stacy Jordan, Economist, OEA
Paula Cech, Economist, OEA

III. Estimate of Public Attendance. Approximately 10 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) NANC Meeting Transcript – March 28, 2019
- (3) Nationwide Number Portability (NNP) Issues Working Group Additional Findings Report on NNP dated May 8, 2019
- (4) NNP Combined Flows dated May 8, 2019
- (5) NNP Technical Sub-Committee Presentation for Final Report to the NANC dated May 8, 2019
- (6) Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System dated April 11, 2019

V. Summary of the Meeting.

A. Approval of Meeting Minutes. The March 28, 2019 Meeting Transcript was approved. Beth Choroser moved to approve the March 28, 2019 transcript and Richard Shockey seconded the motion.

B. Nationwide Number Portability (NNP) Issues Working Group Additional Findings Report on NNP. Mary Retka (Somos), NNP Technical Subcommittee Chair, presented the report to the NANC.

Introduction of NNP Technical Sub-Committee Members. Mary Retka introduced and thanked the following Members of NNP Technical Sub-Committee:

Teresa Patton – AT&T Services;
Philip Linse – CenturyLink;
Beau Jordan – Comcast Corporation;
Chris Drake – iconectiv;

Prof. Henning Schulzrinne – Columbia University;
Rosemary Leist – T-Mobile USA, Inc.;
David Casem – Telnyx, LLC;
Glenn Clepper – Charter; and
Zachary Ross – FCC Liaison.

Background of Sub-Committee Work. Mary presented a brief background of the work of the NNP Sub-Committee. Specifically, she reported that all Sub-Committee members started with a good working knowledge of the previous NNP work under the NANC NNP Working Group. The Sub-Committee has held numerous meetings to address the request from the FCC Wireline Competition Bureau to the NANC Chair, "... to investigate the technical requirements necessary to support NNP, and to provide more detailed cost/benefit analyses ..." of the proposed solutions, providing detailed technical input. At the direction of our FCC liaison, sub-committee work was disengaged during the Government shutdown. The sub-committee was granted additional time and delivered the report to the NANC on 4/5/2019.

Sub-Committee Recommendation Development Process. The sub-committee followed the following process to develop its recommendation:

1. The sub-committee reviewed the National LRN (NLRN) proposal, and then Non-Geographic LRN (NGLRN) one. Significant changes to the original proposal for NGLRN were made and it was relabeled as IPLRN.
2. Upon review of the call flows from the final NNP WG report the team developed more detailed call flows for TDM, Wireless and VoIP applications.
3. With completion of the call flow review, charts for NLRN and NGLRN were developed indicating the technical/network changes the specific entities need to make for each solution, what the potential costs and benefits are, and who bears those costs and who reaps the benefits.

Development of the Flow Charts. Extensive team discussions resulted in the details that are shown in the charts, which are appended to the NNP report. The team determined the assumptions, and the common requirements for both NLRN and IPLRN, for Routing, Rating, Billing and Settlement - for Originating Switches, Transit Switches, and Terminating Switches. In addition, the team agreed to a "T-Shirt" sizing approach for the costs as "an order of magnitude" with the following ranges:

Small (S) - \$10K-\$90K;
Medium (M) - \$100-\$999K;
Large (L) - \$1M-\$9.9M; and
Extra-large (XL) - \$10M+.

Technical Requirements for NLRN and IPLRN. NLRN uses the existing LRNs, with the LRN used being for the rate center the customer now resides in. IPLRN uses the available IP switches, or 3rd party IP networks as gateways, and unique IPLRNs for SPs for NNP routing. Based on the call flow discussions, the team determined that for each of the proposed solutions it

needed to break down the analysis of the NNP changes required in order to look at the costs for the functional switch type (originating, transit, terminating), the function being performed (routing, rating, billing and settlement), and by switch type. Then with SME input, it could determine who bears it and the magnitude of the costs, as well as who benefits.

Final Notes. In the time provided the team was unable to determine the following as it relates to each proposal:

NLRN - if all TDM switches in use are ACQ capable, the tandem configuration capabilities for inter-LATA calls, if some wireless SPs will retain permanent roaming, the handling when the query does not take place in the originating or transit switch, and more.

IPLRN – the use of the code holder for query and routing when the query does not take place in the originating or transit switch, the application of legacy wireline LD charges, if all TDM switches in use are ACQ capable, and more.

Recommended Next Steps for NNP. Significant discussion within the team surfaced some areas where further investigation is needed. Specifically, the team concluded that an additional effort needs to be undertaken to study the impacts on interconnection, compensation, tariffs, and access charges.

The NNP report was approved by a majority of the NANC, with editorial privileges. Beth Choroser moved to approve the NNP Report and Bob McCausland seconded the motion.

NNP Minority Opinion. Richard Shockey voted against the NNP Report, arguing that IP-LRN is not a viable NNP solution. Shockey argued that carriers will be expending time and resources to implement call authentication technologies, among other potential regulatory requirements, and that IP-LRN would be “a bridge too far.” Shockey indicated that he would provide a minority report in dissent.

C. Numbering Administration Oversight Working Group (NAOWG) Report and Recommendation on the Feasibility of Establishing a Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System. Commissioner Paul Kjellander, NAOWG Chair, presented the report to the NANC.

Commissioner Kjellander provided the following overview for the NAOWG’s Report and Recommendation on the Feasibility of Establishing a Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System:

Background of NAOWG Report. Commissioner Kjellander noted that the NAOWG presented its original National Suicide Hotline Improvement Act of 2018 report to the NANC on February 14, 2019. On February 22, 2019 the Chief of the FCC’s Wireline Competition Bureau requested that the NAOWG expand the report to assist the Commission in completing its directive under the National Suicide Hotline Improvement Act of 2018.

- Specifically, the directive from the Bureau was for the NANC, through the NAOWG, to:

- Conduct a study that examines the feasibility of designating a simple, easy-to-remember, three digit dialing code to be used for the crisis hotline; and
- Coordinate with the Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA) and the Secretary of Veterans Affairs (VA), as well as the NANPA.

NAOWG Recommendation Development Process. The NAOWG received input and assistance from NANPA, iconectiv, SAMHSA, the VA, the Alliance of Information and Referral Systems (AIRS) and the National Association of State 911 Administrators (NASNA).

- From November 28, 2018 through April 11, 2019, the NAOWG met for 75 hours of group meetings across 31 meetings to complete the feasibility report.
- In addition to the group meetings, the NAOWG members spent countless hours outside of these group meetings developing contributions and preparing for group meetings.

Submission of Draft Report and NAOWG Recommendation. On April 11, 2019, the expanded report was submitted to the NANC for the Council's review. The NAOWG recommended that the 211 code be expanded.

- Expansion of the 211 code would be the most expedient and beneficial in providing easy access to suicide prevention and mental health crisis support service to help address what has become a national health crisis.
- If the 211 code is expanded, the NANC recommends that a "211 Administrator" be established to manage the effort.
 - As suggested by the SAMHSA, the NANC also recommends concurrent use of the existing toll free numbers (*e.g.*, 800-273-TALK, 800-SUICIDE) that have been institutionalized through traditional promotion and wide-scale use, at least until such time that their call volumes significantly diminish.
- The NANC recommends that the FCC issue a request for comments on its report before providing it to Congress, and a Notice of Proposed Rulemaking before any final order establishing any 3-digit dialing code (N11 or otherwise).

Richard McKeon of SAMHSA made the following comments:

1) Referenced SAMHSA's report to the FCC that spoke to the potential use of 211 as the national suicide prevention number in a section on page 115 called 911,211, and 611 Significance for the National Suicide Prevention Lifeline.

2) Summarized the issues raised in the report which included that a) Not all 211 centers have crisis response capacity; b) The number 211 is associated with information and referral and

not with rapid crisis response; c) SAMHSA's experience with using a single number for a dual purpose in the past was not successful.

3) SAMHSA also highlighted the importance of maintaining the Lifeline's existing infrastructure, particularly the importance of the Lifeline's system of back up centers, a feature which neither 911 or 211 has but which is essential for assuring that calls from individuals in suicidal crisis do not go unanswered.

Robert McCausland of West Telecom Service and a NAOWG member read the following statement:

I have further examined my April 18 call notes, as well as the wording to which Richard McKeon at SAMHSA had alluded – both that within our draft NANC recommendations and that starting on page 15 within SAMHSA's report – and believe that:

- 1) He fears that we're suggesting a diversion of NSPL calls to other entities – which we are not;
- 2) he believes that we're suggesting that 211 continue to operate as it does today, just in more areas (e.g., not universally 24/7/365) – which we are not,
- 3) He's concerned that the expanded use of any dialing code would confuse callers, especially if the word "suicide" were not prominent in messaging – but this could be avoided by SAMHSA negotiating the messaging approach with the 211 Administrator and the VCL (i.e., "rebranding" and re-prioritizing of the IVR options),
- 4) He believes that 211 does not today sufficiently connote an emergency or crisis situation – but except for 911, neither does any of the other dialing codes except for 211 in some areas today,
- 5) He seems to believe that 211 on an expanded-use basis going forward cannot sufficiently connote an emergency or crisis situation – but this is a function of the branding and IVR options over which SAMHSA, the VCL, and the 211 Administrator would have control, and
- 6) There is a true scarcity of the N11 resource, which needs to be recognized as we addressed in our draft.

The NAOWG report was approved by the NANC, with editorial privileges. Commissioner Kjellander moved to approve the NAOWG report and Bob McCausland seconded the motion.

D. Public Participation. None

E. Next Meeting. Thursday, June 20, 2019.