



Federal Communications Commission
Washington, D.C. 20554

December 16, 2019

Jennifer K. McKee
Vice President and Associate General Counsel
NCTA – The Internet & Television Association
Chairperson, North American Numbering Council (NANC)
25 Massachusetts Avenue, NW
Suite 100
Washington, DC 20001

Re: Nationwide Number Portability

Dear Chairperson McKee:

The Wireline Competition Bureau would like to thank you, the NANC, and the Nationwide Number Portability (NNP) Issues Working Group for your Additional Findings Report on Nationwide Number Portability of May 13, 2019 (Report). The work of the NANC and NNP Working Group continues to bring us closer to realizing the promise of NNP.

We are interested in furthering development of a solution for NNP and are encouraged by the progress made by the NANC, as expressed in the Report, and seek for the NANC to continue its work. Based on our review of the NANC's recommendations and other information, we request the NANC to develop more specific recommendations regarding what the NANC describes in the Report as the Internet Protocol Local Routing Number (IPLRN) solution. Specifically, we direct the NANC to:

1. Analyze the likely effects of the IPLRN solution, including as to:
 - a. Interconnection;
 - b. Carrier expenses relating to database dip costs and to transport costs;
 - c. Consumer expectations regarding toll charges; and
 - d. State and federal tariffs for retail and wholesale services.
2. Recommend a path forward to implement the IPLRN solution, including specifically providing recommendations as to:
 - a. The necessary series of steps, including the estimated time each step would take, in implementing the IPLRN solution;
 - b. The extent to which commercial solutions can serve as a substitute for the IPLRN solution for smaller carriers, including the cost of such solutions;
3. Whether the IPLRN solution should be modified in light of any developments since the Report was issued and the conclusions reached with regard to #1; and
4. How to address the objections and concerns raised in the Minority Report accompanying the Report.

We further direct the NANC to approve a written report on its findings on these issues, and to transmit that report to the Wireline Competition Bureau, by July 29, 2020. The NNPWG must submit its recommended report to the full NANC no later than June 28, 2020, to allow for its consideration by all

NANC members. If you have questions about this referral, please contact Marilyn Jones, the NANC's Designated Federal Officer, by telephone at (202) 418-2357, or by email at marilyn.jones@fcc.gov.

Thank you again for your assistance in helping to make nationwide number portability available to all consumers.

Sincerely,

A handwritten signature in black ink that reads "Kris Anne Monteth". The signature is written in a cursive style with a large, stylized initial "K".

Kris Anne Monteth
Chief
Wireline Competition Bureau, FCC