

Resolution: Numbering Policy for IP-enabled services

To be proposed at NARUC meeting in February, 2006

Draft date 2/2/06

WHEREAS, Telephone numbering resources are a limited resource that must be utilized in the most efficient way possible, and

WHEREAS, Currently the North American Numbering Plan (NANP) is administered by the North American Numbering Plan Administrator (NANPA), and

WHEREAS, Pursuant to Section 251(e) of the Communications Act of 1934, the ultimate responsibility for the NANP and NANPA rests with the FCC, and

WHEREAS, Numbering resources are assigned to carriers free of charge, and

WHEREAS, Numbering resources must be assigned in the most efficient way possible while maintaining the flexibility to accommodate the needs of new entrants in the market who are deploying new technologies free from unnecessary regulation or interference; and

WHEREAS, The proliferation of new technologies and services, especially IP-enabled services, has increased opportunities for consumers in the marketplace and has also increased demand for numbering resources, and

WHEREAS, Providers using IP-enabled services often are not directly assigned numbers, but rather partner with incumbent carriers for the acquisition of numbering resources, and

WHEREAS, In many cases the carriers that are partnering with the IP-enabled service providers are not required to participate in Thousand-Block Number Pooling (TBNP), and

WHEREAS, There is currently no consistent or stated policy regarding the assignment of numbers to VoIP service providers and other providers of IP-enabled services, and

WHEREAS, Inefficient use of numbering resources can result in more frequent and costly area code relief proceedings, and

WHEREAS, Some providers of IP-enabled services are requesting, via third-party incumbent carriers large quantities of numbering resources which are often used by customers outside of the state, and possibly outside the United States, in which they are assigned, with little or no benefit to the customers and citizens of that state, and

WHEREAS, TBNP currently is required only in markets designated in the top 100 Metropolitan Statistical Areas (MSAs), and

WHEREAS, Various states have petitioned the FCC for authority to implement additional number conservation measures including the expansion of TBNP beyond the top 100 MSAs, and

WHEREAS, Local number portability, a precursor to TBNP, is on hold in a number of states pending the FCC's completion of the Regulatory Flexibility Analysis (RFA) in CC Docket No. 95-116, and

WHEREAS, There is a need for a national policy regarding the assignment of numbering resources by NANPA and the Pooling Administrator to IP-enabled service providers to ensure

that these valuable, limited resources are used in the most efficient manner possible, without limiting competition or the development of new technologies and services that benefit consumers, with special consideration given to addressing the issue of exporting of large quantities of NANP numbers outside of the states, and possibly the United States, now therefore be it

RESOLVED, By the National Association of Regulatory Utility Commissioners, convened in Washington, D.C. in February, 2006, that NARUC urges the FCC to provide leadership on the issue of numbering for IP-enabled service providers, and be it further

RESOLVED, That NARUC requests the FCC to develop a national policy for the assignment of numbers to IP-enabled service providers which balances both the impact on consumers burdened with additional area code relief due to inefficient use of numbering resources and the needs of IP-service providers to bring new innovations to the marketplace, and be it further

RESOLVED, That any policy developed by the FCC address the concerns raised in several states regarding the exportation of large quantities of NANP numbers to customers in other states and countries, and be it further

RESOLVED, That the FCC address and act on state petitions to expand TBNP beyond the top 100 MSAs, and be it further

RESOLVED, That NARUC urges the FCC to act expeditiously in completing the RFA in CC Docket No. 95-116 to allow the implementation of local number portability, a precursor to TBNP, throughout the nation.