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March 31, 2014

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: GN Docket No. 13-5, GN Docket No. 12-353, WC Docket No. 10-90, CG
Docket No. 10-51, CG Docket No. 03-123, WC Docket No. 13-97
Numbering Testbed Proposals
Written Notice of *Ex Parte***

Dear Ms. Dortch:

John Staurulakis, Inc., (“JSI”) hereby submits the attached written notice of *ex parte* in response to discussions held at the Federal Communication Commission’s (“FCC”) Numbering Testbed Workshop on March 25, 2014 regarding Neustar’s recommendation to grant consumers direct access to telephone number assignments.

JSI appreciates the opportunity to contribute to the FCC’s “development of a telephony numbering testbed for collaborative, multi-stakeholder research and exploration of technical options and opportunities for telephone numbering in an all-IP network.”¹

Respectfully submitted,

Valerie Wimer
Vice President

Cc: Dr. Henning Schulzrinne, Chief Technology Officer

Enclosures

¹ See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 at para. 152 (rel. Jan. 31, 2014) (“Technology Transitions Order”).

In the Neustar filing submitted to the FCC on March 14th the idea of granting consumers direct access to telephone number (“TN”) assignments was proposed.² The Neustar concept was further discuss at the FCC Numbering Testbed Workshop on March 25, 2014. Direct assignment to consumers would bypass TN assignments from service providers. JSI believes that consumers should not be provided direct access to TNs unless consumers also assume burden and responsibilities associated with the number assignment. At this time, JSI does not believe consumers should assume the burdens associated with direct access to TN management.

Today, TNs are considered a public resource and are not owned by the assignees. Thus, these resources may not be sold, brokered, bartered or leased by the assignee for a fee or other consideration. It would be difficult to enforce these rules in an environment where consumers have direct access to numbering.

The managing and monitoring of numbers is also a concern in an environment which permits consumers direct access to TNs. The current numbering environment incorporates a utilization and forecasting system in which all service providers assigned numbers or that have a future need for the assignment of numbers must report to a national numbering administrator - currently the North American Numbering Plan Administration (“NANPA”). From this reported data, the NANPA has the responsibility to maintain an accurate inventory of available numbers. Only through this process can a proper determination of number availability be established. In the all-IP world there will be significant changes to the databases used and the inventory process. The need to know the following will still be important: the accurate status of available TN inventory for future assignment, the ability to return the number to the inventory, and validation of number utilization. Consumers are not involved in these ongoing processes which are critical to the actual service(s) associated with the TN.

In the broader picture, TNs are expected to have security credentials associated with the numbers to prevent such problems as identity theft or spoofing. If consumers were allowed to have direct access to TNs, this would place the responsibility upon the consumer to purchase/contract independently for these security credentials. If consumers were required to obtain TNs from a service provider, it is expected that that service provider assumes the responsibility for obtaining and maintaining all aspects of security on TNs assigned by that service provider for as long as the consumer remains with that service provider. Therefore, the consumer only has the initial responsibility to obtain the credentials and then ongoing responsibilities are shifted to the service provider.

In an all IP environment, it is expected that TNs will have a myriad of services associated with the number; and, as well, may act as a type of identification for consumers. Enhancing the capabilities associated with TNs is a logical progression for consumers who want a more mainstream identifier for these services. However, at the same time, it places a more essential requirement that these services are properly initiated, updated and maintained in an IP world. As some of the associated services may be much more

² Letter from Aaron N. Goldberger, Neustar, Inc., to Marlene H. Dortch, FCC, GN Docket No. 12-353, *et al.* (filed March 14, 2014).

impacting to consumers, (e.g 911 and security), it would be to the overall benefit of the consumer that service providers ensure all associated services are completed in an accurate and timely manner. Otherwise, the industry would be required to ensure all consumers are properly educated in the processes required. A consumer's safety/security should not be jeopardized by placing a burden upon them that they may not be willing to accept or that they may inadvertently get wrong, even if they choose to accept the responsibility.

As the future of numbering in an all IP network anticipates a consumer to use their TN for multiple purposes, the industry will need to ensure that the consumer's best interests are protected and secured. By allowing the consumer direct access to TNs, the industry places an undue burden on the consumer to properly educate themselves on the necessary steps for securing their own TNs. Service providers are more acquainted with industry practices and standards and are in a better position to provide these services to consumers, thus providing their customers with assurances that their TNs are properly secured.

For these reasons, JSI believes that service providers should remain responsible for assigning numbers to their customers and not allow consumers direct access to telephone numbers.