

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544**

In the Matter of:

**Numbering Resource Optimization
FCC Form 502**

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**CC Docket No. 99-200
OMB Control Number
3060-0895**

**COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION, THE
MAINE PUBLIC UTILITIES COMMISSION, AND THE PUBLIC SERVICE
COMMISSION OF THE DISTRICT OF COLUMBIA REGARDING THE
INFORMATION COLLECTION FOR FCC FORM 502**

Pursuant to the March 26, 2025 Public Notice¹ regarding the Federal Communications Commission’s (FCC) Form 502, the California Public Utilities Commission, the Maine Public Utilities Commission, and the Public Service Commission of the District of Columbia (State Commissions) respectfully file comments proposing recommendations to clarify the information received in the Form 502. As requested by the Public Notice, the State Commissions offer “ways to enhance the quality, utility, and clarity of the information collected.”² Specifically, the State Commissions request that the FCC revise the Form 502 to prohibit submission of the Form 502 unless Reporting Carriers identify the carriers to which they wholesale intermediate numbers; to require that carriers that receive numbers from Reporting Carriers and then wholesale numbers to other carriers identify these other carriers; and to require the provision of state-specific regulatory contact information. These reforms will provide state commissions with additional information regarding the carriers that are using numbering resources in their states and will facilitate

¹ 90 Fed. Reg. 13749-13750 (March 26, 2025).

² 90 Fed. Reg. 13749.

contacting Reporting Carriers to obtain additional information about the use of numbering resources in their states if needed.

INTRODUCTION

All Reporting Carriers receiving telephone numbers from the North American Numbering Plan Administrator (NANPA), the Pooling Administrator, or another telecommunications carrier must file Numbering Resource Utilization Forecast (NRUF) Reports on a semi-annual basis on FCC Form 502.³ As the Public Notice indicates, the FCC, state regulatory commissions, and NANPA use the data provided in Form 502 to monitor numbering resource utilization by Reporting Carriers and to project area code and North American Numbering Plan (NANP) exhaust.⁴

As state commissions monitor number resource utilization in their jurisdictions, the major source of information is the NRUF Report. However, in their review of NRUF Reports, state commissions have noticed differences in the ways Reporting Carriers identify numbering resources, raising questions for state commissions. State commissions have had to allocate staff time and resources to seek additional information, while Reporting Carriers have had to expend staff time and resources to answer state commission requests. State commissions believe that the NRUF could be clarified to minimize these questions, saving state commission and Reporting Carrier time and other resources.

³ 47 C.F.R. § 52.15(f)(2).

⁴ 90 Fed. Reg. 13750.

REPORTING OF INTERMEDIATE NUMBERS.

The NRUF Reports require Reporting Carriers to classify numbering resources in specific number use categories: assigned; intermediate; reserved; aging; and administrative.⁵ Intermediate numbers are

numbers that are made available for use by another telecommunications carrier or non-carrier entity for the purpose of providing telecommunications service to an end user or customer.⁶

In their review of NRUF Reports, state commissions have noted that Reporting Carriers appear to classify numbering resources provided to other service providers in different categories; some Reporting Carriers include these numbers as assigned, while others include these numbers as intermediate numbers. These different reporting categorizations make it difficult for state commissions to determine which service provider is actually using the numbers. The National Association of Regulatory Utility Commissioners (NARUC) has attempted to provide additional clarity by organizing panel discussions on numbering topics, including NRUF reporting, at recent conferences.⁷ However, in the most recent reporting period, state commissions noticed that Reporting Carriers are still classifying numbers provided to other carriers in different ways. This different labeling of numbers provided to other carriers by Reporting Carriers leads state commissions to undertake complex investigations to determine which service provider is using the numbers, expending both state commission and Reporting Carrier resources.

⁵ 47 C.F.R. § 52.15(f)(5)ii).

⁶ 47 C.F.R. § 52.15(f)(1)(v). The State Commissions note that ported numbers are required to be reported as assigned by the Reporting Carrier that obtained the numbering resource.

⁷ See, Where Have All the Numbers Gone? panel at the NARUC 2024 Winter Policy Summit; Strategies for Number Conservation; Deciphering the NRUF panel at the NARUC 2024 Annual Meeting.

For numbers included in the intermediate category, the notes/assignee column identifying the other service providers that have obtained the intermediate numbers on the U-1 and U-3 Forms is sometimes left blank, leaving state commissions unclear on the identity of the service provider using the intermediate numbers. State commissions believe that the U-1 Form on Form 502 could be modified so that Reporting Carriers that list intermediate numbers must identify the carriers that have received numbers in the notes/assignee column before the form is accepted as complete. On the U-3 Form, the Form 502 could be modified so that U-3 Reporting Carriers receiving intermediate numbers must identify the carrier that provided the numbers to the U-3 Reporting Carriers in the notes/assignee column before the Form 502 is accepted as complete.

EXTENDING REPORTING CARRIER OBLIGATIONS TO CARRIERS THAT RECEIVE NUMBERING RESOURCES INDIRECTLY.

Through their investigations of NRUF data, some state commissions have become aware of a growing trend regarding transfer of telephone numbers through a chain of several carriers before the numbers are assigned to an end user. For example, a Reporting Carrier wholesales telephone numbers to a second carrier, which then wholesales the numbers to a third carrier. This process can continue through several carriers.⁸ However, only the Reporting Carrier and perhaps the second carrier, not the subsequent carriers, are identified on the U-1 and U-3 Forms of Form 502. In these cases, state commissions may have great difficulty determining the identity of the subsequent carriers. To remedy this problem, state commissions propose that Form 502 be amended so that U-3 Reporting Carriers receiving intermediate numbers identify any subsequent carrier to which numbers are wholesaled in addition to identifying the Reporting Carrier from

⁸ See, *Numbering Administration Oversight Working Group (NOAWG) Direct Access Report* at 5, December 13, 2024.

which they have received numbers. The subsequent carriers should then also be required to file the Form 502.

MORE COMPLETE CONTACT INFORMATION FOR REPORTING CARRIERS SHOULD BE REQUIRED ON THE FORM 502.

When state commissions investigate questions on the Form 502, they have occasionally have difficulty in finding the Reporting Carrier employee who has the most complete knowledge about the particular state's Form 502 filing, since that employee may not be the Contact Person identified on the Form 502. To reduce the time it takes to find the employee with numbering expertise in a particular state, state commissions recommend that the contact information section be expanded to add contacts and their contact information by state on the Company Info Form.

INFORMATION ON MERGERS, ACQUISITIONS, AND COMPANY CLOSURES SHOULD BE INCLUDED ON THE FORM 502

Although the Form 502 requires carriers to populate the Company Information Page,⁹ specifically with information regarding the highest parent Operating Company Number (OCN), it currently does not require carriers to report any recent mergers, acquisitions, and/or company closures. Some carriers have multiple parent companies and several subsidiaries operating in a particular state. The absence of a requirement for carriers to report information on their mergers, acquisitions, and closures may result in unreported or unaccounted number blocks, and reporting gaps related to mergers and acquisitions. Some state commissions are experiencing delays in unused numbering block reclamations and redistributions when carriers go out of business or change ownership, while other state commissions are finding it impossible to reclaim unused numbering blocks when carriers go out of business or change ownership before transferring the

⁹ [FCC Form 502 NRUF Form 502 Geo 2016](#), page 3; Numbering Resource Utilization/Forecast (NRUF) Form 502 Job Aid, November 27, 2024, page 10.

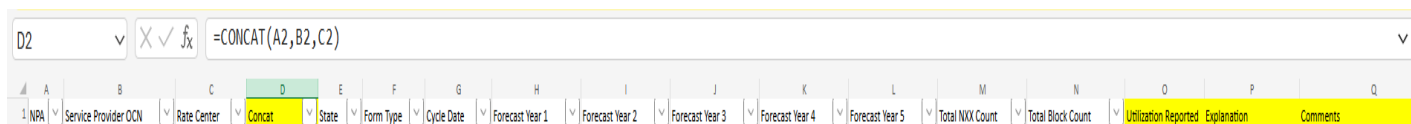
unused numbering blocks back to the pool. To facilitate tracking of unused numbering blocks, state commissions request that the Company Information Page be updated to require information on any mergers or acquisitions occurring in the past reporting period.

FORECAST VERIFICATION MECHANISMS TO AVOID NUMBERING BLOCKS HOARDING SHOULD BE IMPLEMENTED.

Since carriers must submit their Excel Form 502 semi-annually, there may be infrequent monitoring of unused numbering blocks. As such, state commissions believe that implementing forecast verification mechanisms would enhance efficiency and discourage carriers from over-forecasting their numbering needs. These mechanisms could include cross-checking forecasted demand against historical utilization trends, and requiring carriers to explain large or unexpected increases in their number forecasts.

To integrate verification measures into the Excel Form 502, the following proposed modifications are recommended:

- Concatenation for Verification: Insert a column using formula = CONCAT(A2,B2,C2). This formula combines the NPA, service provider OCN, and Rate Center to ensure accurate verification within both the NRUF Forecast Report and the NRUF Utilization Report. Example depicted in this image.



- Utilization Reporting in Forecast Report: Add a column for utilization data and apply this formula: =XLOOKUP(Concat column,'UtilizationReport'!\$F:\$F,'UtilizationReport'!\$I:\$I,FALSE). This formula pulls utilization data from the carrier Utilization Report to compare it with the forecasted values.

- NANPA's definition of utilization is "All applicants for growth numbering resources shall achieve a 75% utilization threshold."
- When utilization is reported below 75%, it indicates under-utilization. However, when Total Block Count forecasted is higher than the Utilization rate, it indicates over forecasting which will automatically trigger an "Explanation Needed."
- The formula that can be used for the "Explanation Needed" is =IF(AND(Total Block Count<>"",Total Block Count>5,Utilization Reported<75),"Explanation Needed", "").
- This formula automatically inserts "Explanation Needed" when:
 - The forecasted block count is greater than **5**
 - The reported utilization rate is **below 75%**

When "Explanation Needed" populate, carriers must provide a justification in the "Comment" section. Example depicted in this image.

P149 ✕ ✓ f_x =IF(AND(N149<>"",N149>5,O149<75),"Explanation Needed", "")									
	J	K	L	M	N	O	P	Q	
	Forecast Year 3	Forecast Year 4	Forecast Year 5	Total NX Count	Total Block Count	Utilization Reported	Explanation	Comments	
48	10	10	10	10		48	41 Explanation Needed		
49	7	8	8	8		36	25 Explanation Needed		
50	4	5	7	8		27	33 Explanation Needed		

By holding carriers accountable for the accuracy of their projections, state commissions can then reduce resource hoarding, distribute numbering blocks fairly, and ultimately delay the exhaust of numbering resources in high-demand areas.

CONCLUSION

The State Commissions believe that these revisions to the Form 502 could assist both state commissions and Reporting Carriers in reducing the complexity of investigations into the use of numbering resources. The State Commissions request that the FCC revise the Form 502 consistent with these comments, and implement forecast verification mechanisms to avoid resource hoarding.

Respectfully submitted,

For the Public Service Commission of the District of Columbia

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