

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of:

Notice and request for comments on  
extension of a currently approved  
information collection process regarding the  
safety valve and specialized overlay  
delegation authority

OMB Control Number: 3060-1005

**COMMENTS OF THE STATE OF CALIFORNIA  
AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION**

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## **I. INTRODUCTION**

On August 26, 2025, the Federal Communications Commission (FCC) issued a notice and request for comment on the Information Collection submitted for review and approval to the Office of Management and Budget.<sup>1</sup> The FCC specifically seeks comment on the extension of a currently-approved information collection process regarding the safety valve and specialized overlay delegation authority.<sup>2</sup> Recognizing the continuing importance of numbering conservation and granting states the flexibility to ensure market demands are met due to technological advancements, the FCC seeks to extend the existing safety valve and specialized overlay information collection frameworks.

The California Public Utilities Commission (CPUC) supports the FCC's proposed extension of OMB Control No. 3060-1005. The continuation of the safety valve mechanism and specialized overlay via delegated authority is essential to ensure that the CPUC can respond rapidly to potential exhaustion of numbering resources in regions with high numbering demand due to growth.

## **II. DISCUSSION AND RECOMMENDATIONS**

### **A. Safety Valve Requests**

We support and encourage the FCC to maintain its flexibility by allowing states facing imminent area code depletion the option to grant relief via the safety valve mechanism. By maintaining the information collection framework with this

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<sup>1</sup> [H.R.327 — 107th Congress \(2001-2002\)](#)

<sup>2</sup> [Federal Register Doc. 2025-16287](#)

procedural extension, the FCC will continue to process and authorize state-level actions, allowing for more flexibility in states wishing to intervene early during numbering exhaustion.

## **B. Specialized Overlays**

The FCC's allowance for specialized overlays (SOs) is a valuable tool and the extension allows the petition process to function under FCC oversight; however, the current guidance lacks clarity on how such overlays should be justified in state petitions. We request that the FCC issue a public bulletin or technical guidance clarifying common SO denial reasons, available methods of alternative relief, acceptable SO use cases, service provider documentation standards, and expectations for service providers regarding public education.

Additionally, the CPUC seeks clarity on the following issues: (1) whether a state can seek approval for SO that is technology neutral but covers services that are data-only and do not have a voice component, (2) whether a state can seek approval to implement SO in individual and multiple rate centers, to single and multiple numbering plan areas within the state, and up to the entire state, and (3) whether a state can request new area codes solely used for implementing a statewide SO.

## **III. CONCLUSION**

The CPUC supports the FCC's extension of the information collection framework regarding the safety valve and specialized overlay delegation authority. The collection process formalized under OMB 3060-1005 enables structured

coordination between the FCC and state commissions. Numbering relief mechanisms, such as specialized overlays and safety valve mechanisms, help states avoid numbering disruptions in fast growing cities with unexpected numbering demands. The extension will continue the existing process of allowing and providing flexibility for state actions regarding numbering conservation and relief. We appreciate the opportunity to provide input to the FCC.

Respectfully submitted,

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