

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Nationwide Number Portability)	WC Docket No. 17-244
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	

**REPLY COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to *Notice of Proposed Rulemaking (NPRM) and Notice of Inquiry (NOI)*, released October 26, 2017, in the above-referenced dockets. The comments reflect input developed in ATIS' Packet Technologies and Systems Committee (PTSC), Industry Numbering Committee (INC), Ordering and Billing Forum (OBF), and Next Generation Interconnection Interoperability Forum (NGIIF). ATIS is pleased to have the opportunity to provide its input on the significant issues raised in the above-referenced *NPRM* and *NOI*.

In its comments, ATIS provided input regarding the approaches to nationwide number portability (NNP) outlined in the *ATIS Technical Report on a Nationwide Number Portability Study (ATIS Report)*.¹ In its comments, ATIS reiterated some of the points made in the *ATIS Report* that: (1) the commercial agreements approach is feasible and in place today; (2) the nationwide and non-Geographic Location Routing Numbers approaches would require additional

¹ *ATIS Technical Report on a Nationwide Number Portability Study* (ATIS-1000071) is available for electronic download at no charge from the ATIS Document Center at <https://www.atis.org/docstore/product.aspx?id=28281>.

work, including the examination of possible changes to some carrier systems, processes, and equipment, as well as the possible development of new/revised guidelines; and (3) the GR-2982-CORE approach cannot be implemented given its impact on legacy, manufacturer-discontinued network elements.² Commenters representing a broad cross-section of service providers echoed these points, underscoring that NNP must be implemented in a careful, well-planned manner.

ATIS is pleased to report that PTSC has recently agreed to undertake a deeper technical analysis of the previously-identified potential approaches to NNP. This work will include a thorough and comprehensive analysis of the initial *ATIS Report* with the goal of providing more information on the scope of the technical- and systems-related impacts needed to support NNP. The proposed new PTSC technical report would also identify any new standards or changes to existing standards/solutions that would be necessary to implement NNP, as well as NNP implications for existing networks, especially circuit-switched networks. Finally, this new technical report will also consider whether criteria/metrics could be developed to assess the feasibility of deploying each of the identified NNP approaches within service provider networks.

The new NNP report, which is expected to address some of the input received from commenters in this proceeding, is anticipated to be completed in late 2018. ATIS will provide more information to the Commission once the report has been completed.

² ATIS Comments at pp. 11-12.

CONCLUSION

ATIS appreciates the opportunity to provide the above reply comments and respectfully requests that the Commission consider ATIS' input.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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