

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

In the matter of)	
Numbering Policies for Modern)	WC Docket No. 13-97
Communications)	
Telephone Number Requirements for)	WC Docket No. 07-243
IP-Enabled Service Providers)	
Implementation of TRACED Act)	WC Docket No. 20-67
Section 6(a) — Knowledge of Customers by)	
Entities with Access to Numbering Resources))	
Process Reform for Executive Branch Review))	IB Docket No. 16-155
of Certain FCC Applications and Petitions)	
Involving Foreign Ownership)	

COMMENTS OF THE MICHIGAN PUBLIC SERVICE COMMISSION

On August 6, 2021, the Federal Communications Commission (FCC) released a Further Notice of Proposed Rulemaking (FNPRM) in the docket numbers referenced above seeking comment on proposals that seek to reduce illegal robocalls by proposing to update their rules regarding direct access to numbers by providers of interconnected Voice over Internet Protocol (VoIP) services. The FCC explains that the actions it proposes are also intended to provide additional guardrails to safeguard the nation’s finite numbering resources, protect national security, reduce the opportunity for regulatory arbitrage, and further promote public safety.¹

¹ FNPRM <https://docs.fcc.gov/public/attachments/FCC-21-94A1.pdf>, pg 2

The FNPRM notes that the increase in robocalls and the emergence of VoIP services in the marketplace go hand in hand.² Since 2015, the FCC has allowed VoIP providers direct access to numbering resources rather than obtain them through a carrier partner. The Michigan Public Service Commission (MPSC) respectfully offers the following comments regarding the FNPRM.

The FNPRM seeks comment on whether the FCC should revise its existing rules to clarify that interconnected VoIP providers holding an FCC numbering authorization must comply with state numbering requirements and other applicable requirements for businesses operating within the state.³ Since the FCC granted VoIP providers direct access to numbering resources, the MPSC has received numerous 30-day notices from providers that have applied or intend to apply for numbering resources in the state. The MPSC has two additional registration obligations, which also apply to all other providers offering service in the state, that VoIP providers are required to complete while the 30-day notices are under review by the MPSC.⁴ The MPSC has received pushback from some VoIP providers regarding the additional registration requirements, as they believe federal authorization is all that is required to obtain numbering resources in the state. The MPSC believes VoIP providers seeking numbering resources from a Number Planning Area within a state should comply with the state's registration

² FNPRM pg. 2

³ FNPRM pg. 16-17

⁴ MPSC requires that providers register with the State of Michigan Department of Licensing & Regulatory Affairs Corporations Division to do business within the state and with the MPSC's Intrastate Telecommunications Service Provider Database pursuant to section 211a of the Michigan Telecommunications Act.

requirements. Because providers are requesting numbers from area codes associated with our geographic area, the MPSC believes that VoIP providers should be required to adhere to state requirements when seeking numbers within the state. The MPSC asks the FCC to clarify that VoIP providers must adhere to state registration requirements and to allow the North American Numbering Plan Administrator to deny provider requests that do not comply with state requirements.

Using the Alliance for Telecommunications Industry Solutions' numbering guidelines template as a model, the MPSC has developed its own 30-day notice template that has been posted to the MPSC's website to allow providers to have a single form for submitting their 30-day notice and to indicate compliance with the additional registration requirements.⁵ Because no established standards exist for 30-day notice formats, the notices that are received by the MPSC can vary greatly. The notices can range from a simple Word document with a list of rate centers, to an email with a spreadsheet laying out plans to blanket the state with several blocks from each rate center within the state (amounting, in some instances, to requests for tens of thousands or hundreds of thousands of numbers), often including rural rate centers with a couple hundred people living in them. The MPSC asks the FCC to consider requiring standardized formats for these 30-day notices. Standardization would streamline the process for every stakeholder

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https://www.michigan.gov/documents/mpsc/VoIP_Number_Notification_Letter_Template_final031716_526973_7.docx

involved, while helping to more easily identify what resources the provider is seeking within a state.

In the FNPRM, the FCC also addresses the authority to revoke direct access to numbers under the VoIP Direct Access Order. The FNPRM reiterates that the Order allows the FCC to revoke direct access to numbers for failure to comply with the FCC's numbering rules. It also proposes to clarify that the FCC may also revoke authorization for failure to comply with any applicable law, where a provider no longer meets the qualifications that originally provided the basis for the grant of direct access to numbers, or where the authorization no longer serves the public interest. The MPSC supports this proposal of not allowing a provider to obtain new numbers from the Numbering Administrator should that authorization be revoked. As the FCC notes, there could be valid reasons for revoking such authorization (due to a national security risk or risk of originating numerous unlawful robocalls) and doing so would also protect the public and preserve the limited pool of numbers.⁶

The MPSC supports the FCC's proposals to update its rules for VoIP providers to obtain direct access to numbering resources to help curb illegal robocalls and create a more efficient process for VoIP providers to obtain numbers from the Numbering Administrator. The 30-day notices that VoIP providers currently provide to state commissions should be standardized, and the Commission should allow the Numbering Administrator to deny applications for numbering resources from providers who do not adhere to state requirements in jurisdictions

⁶ FNPRM pg 17-18

where they are requesting resources. The Michigan Public Service Commission appreciates the opportunity to provide comments regarding the Commission's proposals to update the rules for VoIP providers' direct access to numbering resources and looks forward to reviewing further comments submitted in the docket and reserves the right to submit replies, as needed.

Respectfully Submitted,

MICHIGAN PUBLIC
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