

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Interconnected VoIP Numbering)	
Authorization Application Filed)	
by NumberBarn, LLC)	FCC Docket No. WC19-99
Pursuant to Section 52.15(g))	
of the Commission's Rules)	

COMMENTS OF THE MICHIGAN PUBLIC SERVICE COMMISSION

On September 24, 2024, the Federal Communications Commission (FCC or Commission) released a Public Notice seeking comment on the interconnected VoIP numbering authorization application filed by NumberBarn, LLC (NumberBarn). On September 26, 2024, the National Association of Regulatory Utility Commissioners (NARUC) filed a motion to remove NumberBarn's application from streamlined treatment and to extend the date for initial comments by 30 days to allow state public utility commissions to offer comments regarding numbering resources within their specific states that are relevant to NumberBarn's request. On October 4, 2024, the FCC granted NARUC's motion, extending the comment deadline to November 8, 2024, and further established a reply comment date of November 22, 2024.¹ The Michigan Public Service Commission Staff (MPSC Staff) respectfully submits the following comments regarding the application.

¹ Notice of Interconnected VoIP Number Authorization Application Removal, <https://docs.fcc.gov/public/attachments/DA-24-1041A1.pdf>.

While the MPSC Staff recognizes that interconnected VoIP service providers are allowed to obtain numbers directly from the North American Numbering Plan (NANP) following FCC authorization, NumberBarn’s business practices in handling telephone numbering resources create concern for the MPSC Staff. A review of NumberBarn’s website demonstrates that they rely on acquiring large quantities of both geographic and toll-free telephone numbers from around the country to sell or license to subscribers for a fee, with a special focus on vanity number assignments to command a higher price point.² As of October 23, 2024, NumberBarn’s website states that they have over 73 million numbers available for assignment. *See*, Attachment A.

In further reviewing NumberBarn’s website, the MPSC Staff conducted a search for Michigan area code specific numbers. In one search of the “Prime Spellings” number offerings, which are vanity numbers, the least expensive shown in the search was \$5000 and the most expensive was \$7000. *Id.* The practice of selling these numbers seems to be contrary to the Alliance for Telecommunications Industry Solutions’ (ATIS) industry best practices outlined in Section 2.1 of the Thousands Block and Central Office Code Administration Guidelines (TBCOCAG). Section 2.1 states, in part, that as a public resource “the Numbering Resources cannot be sold, brokered, bartered, or leased by the Assignee for a fee or other consideration” and that “[i]f a Numbering Resource is sold, brokered, bartered, or

² <https://www.numberbarn.com/>

leased for a fee, the resource is subject to Reclamation. . . .”³ The MPSC Staff urges diligence when considering NumberBarn’s application for direct access to numbering resources as it already appears that NumberBarn is circumventing, or allowing other providers to circumvent, telecommunications industry numbering best practices by allowing these numbers to be posted for sale or leased for a fee on its website.

In an effort to obtain additional empirical data to support these comments, the MPSC Staff called 50 random telephone numbers listed on NumberBarn’s website on October 8, 2024. *See, Attachment B.* This initiative revealed that 35 of the 50 phone numbers called led to gift card offerings, insurance quotes, and rebates if the caller pressed 1 to provide additional information. While not necessarily indicative of NumberBarn’s entire inventory, the fact that 70 percent of the MPSC Staff’s test calls were answered by a recording seeking additional information from callers while promising them some form of benefit causes concern regarding NumberBarn’s direct access to numbering resources.

The MPSC Staff is also concerned about how the practices of NumberBarn are exacerbating the depletion of numbering resources from the NANP, which could lead to additional area code relief proceedings for states. Further review of NumberBarn’s website shows that they also sell consecutive numbering blocks, some consisting of 50 numbers or more. *See, Attachment C.* Additional review of their website shows vast amounts of numbers advertised for sale. For example,

³ Thousand Block & Central Office Code Administration Guide (“TBCOCAG”) § 2.1. – https://access.atis.org/higherlogic/ws/public/document?document_id=77538.

there were 35,553 numbers listed for Michigan’s 313 area code as of October 18, 2024. *See*, Attachment D. Michigan’s 517 area code review shows many rate center areas with small populations, yet there are thousands of telephone numbers listed as available in these rate centers. *Id.*

NumberBarn is registered as a Responsible Organization (RESPORG) for assigning toll-free telephone numbers.⁴ Given NumberBarn’s advertised bank of available phone numbers on their website, the Commission should ensure that NumberBarn is following the rules and regulations surrounding toll-free numbers prior to granting any direct access to geographic telephone numbers. With such a large quantity of numbers available for assignment, the MPSC Staff has concerns that NumberBarn may be “Warehousing”⁵ and “Hoarding”⁶ toll-free numbers for assignment. If it is discovered that NumberBarn is not complying with the regulations for toll-free numbers, it stands to reason that they may participate in these activities using geographic numbers in the future as well.

Additionally, the FCC Form 499 Filer Database reflects that NumberBarn currently provides telecommunications services in Michigan.⁷ However, as of October 11, 2024, the company is not registered with the MPSC’s Intrastate

⁴ Resporgs, <https://tollfreenumbers.com/resporgs/>

⁵ The Code of Federal Regulations describes warehousing as “the practice whereby Responsible Organizations, either directly or indirectly through an affiliate, reserve toll free numbers from the Service Management System database without having an actual toll free subscriber for whom those numbers are being reserved.” 47 CFR 52.105

⁶ The Code of Federal Regulations describes hoarding as “the acquisition by a toll free subscriber from a Reasonable Organization of more toll free numbers than the toll free subscriber intends to use for the provision of toll free service. The definition of hoarding also includes number brokering, which is the selling of a toll free number by a private entity for a fee.” 47 CFR 52.107.

⁷ FCC Form 499 Filer Database, <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=832502>

Telecommunications Service Provider database⁸ nor with the Michigan Department of Licensing & Regulatory Affairs Corporations, Securities & Commercial Licensing Bureau.⁹ Prior to approving any application for direct access to numbering resources, the FCC should ensure that NumberBarn is adhering to state compliance requirements.

The MPSC Staff appreciates the opportunity to comment on NumberBarn's application for direct access to numbering resources. NumberBarn's utilization of numbering resources appears to be contradictory to the TBCOCAGs and potentially the regulations surrounding toll free number assignment. For these reasons, the MPSC Staff urges the Commission to more thoroughly review NumberBarn's application for direct access to these finite resources. The MPSC Staff recommends the FCC deny the application if it finds that NumberBarn's application does not comply with the FCC's regulations to obtain direct access to telephone numbers and it is not in the public interest to grant NumberBarn's application. The FCC should further review NumberBarn's current numbering use practices to ensure compliance with existing federal and industry numbering standards. The questionable use of telephone numbering resources can lead not only to unwanted robocalls, but also to area code relief proceedings which can be an extensive undertaking by the telecommunications industry, state commissions, and affected

⁸ Interstate Telecommunications Service Providers, <https://mpsc.my.site.com/itsp/ITSPHome>

⁹ Licensing and Regulatory Affairs Corporations Online Filing System, <https://cofs.lara.state.mi.us/SearchApi/Search/Search>

customers that may need to reprogram equipment or make administrative and advertising changes to introduce a new area code.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

Anna B. Stirling (P84919)
Assistant Attorneys General
Public Service Division
7109 W. Saginaw Hwy., 3rd Floor
Lansing, MI 48917
Telephone: (517) 284-8140

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Attachment A

NumberBarn Website Advertising Over 73 Million Available Numbers. October 23, 2024.

SUPERCHARGE YOUR PHONE NUMBER

1 MILLION ACTIVE NUMBERS

- BUY & LICENSE**
Find a custom and memorable local or toll free phone number
[GET A NUMBER](#)
- POWER UP**
Enable your phone number to be automated, responsive and ready
[VIEW FEATURES](#)
- KEEP YOURS**
Save your current phone number. Park it. Save it. Boost it!
[START A TRANSFER](#)

Keyword, name or digits [SEARCH NUMBERS](#) Marketplace of 73,616,980 available local & toll free numbers

Source: NumberBarn - <https://www.numberbarn.com/>

NumberBarn website Prime Spellings. October 17, 2024

PRIME SPELLINGS

(231) 666-6275 \$100.00	(616) 796-0103 \$5.00	(313) 666-0606 \$1,000.00	(616) 215-0103 \$5.00
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(616) 616-FUND \$5,999.00	(616) 616-WEED \$5,999.00	(906) LOW-RATE \$7,000.00	(989) 300-FORD \$5,500.00	(906) FLOWERS \$5,999.00	(616) FIGHTER \$5,000.00	(313) GET-BOND \$5,500.00	(269) CABINET \$6,999.00	(313) 444-REAL \$5,000.00	(517) NAUGHTY \$5,000.00
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Source: NumberBarn - <https://www.numberbarn.com/search?type=local&state=MI>

Attachment B

Michigan Data Sample from numberbarn.com on October 8, 2024			
Number Called	Price	Call Result	Recording Answered
9063456789	\$5,467.89	This number is not in service, contact numberbarn or numbergarage to obtain this number.	
5177586000	\$499.00	Rings until disconnect	
6166169333	\$5,999.00	Message that says "this number is available for your marketing needs, please call Dan at 9253000000."	
5177423337	\$1,665.00	Gift card offer for entering information, press 1 to speak with agent now.	x
9063569377	\$5,999.00	Busy signal	
3134382663	\$5,500.00	Vanity number owned by www.damngooddigits.com. Visit their website to learn more.	
5176284489	\$5,000.00	Available for your business needs. Email Ray@bizly.com	
8106380112	\$5.00	Busy signal	
2314120114	\$5.00	Busy signal	
9899850126	\$5.00	busy signal	
7344999251	\$450.15	Gift card offer for entering information, press 1 to speak with agent now.	x
3139000770	\$450.23	Gift card offer for entering information, press 1 to speak with agent now.	x
2695299006	\$450.50	100\$ reward offered. Press 1 for additional information.	x
7349333889	\$450.48	Gift card offer for entering information, press 1 to speak with agent now.	x
5862872441	\$452.00	Save on car insurance. Take survey, 3 questions.	x
2693742383	\$452.00	Gift card offer for entering information, press 1 to speak with agent now.	x
2692223399	\$452.00	Travel, elderly assistance, insurance quotes.	x
9473273390	\$452.00	Gift card offer for entering information, press 1 to speak with agent now.	x
2693463455	\$452.00	Gift card offer for entering information, press 1 to speak with agent now.	x
5862787158	\$452.00	Gift card offer for entering information, press 1 to speak with agent now.	x
2698677165	\$452.00	Medicare insurance quotes.	x
2697867174	\$452.00	Gift card offer for entering information, press 1 to speak with agent now.	x
2698677174	\$452.00	Special discounts on services.	x
2694866377	\$20,000,000.00	Call cannot be completed at this time.	
9473273348	\$5,000,000.00	Gift card offer for entering information, press 1 to speak with agent now.	x
9473668733	\$5,000,000.00	Gift card offer for entering information, press 1 to speak with agent now.	x
5868374966	\$1,110,000.00	Gift card offer for entering information, press 1 to speak with agent now.	x
2694768708	\$116,599.00	Retail rebate of \$100. Press 1 for more information.	x
2694768717	\$116,599.00	Retail rebate of \$100. Press 1 for more information.	x
3137777777	\$129,999.97	Busy signal	
2694768794	\$111,000.00	Rebate Offer. Press 1 to connect.	x
2694768700	\$100,000.00	Just for calling today. Gift card offer. Press 1 for more information.	x
2694768701	\$100,000.00	Save \$200 or more on car insurance. 3 Question survey.	x
7344237278	\$30,310.00	Special prices and discounts available to you for calling. Press 1 to hear.	x
7344237296	\$30,310.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344237304	\$30,310.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344238493	\$30,310.00	Medicare insurance quotes.	x
7344238501	\$30,310.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344238510	\$30,310.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344238038	\$28,854.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344238047	\$28,854.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344238056	\$28,854.00	Gift card offer for entering information, press 1 to speak with agent now.	x
9063456789	\$4,567.89	Available for use. Search for Numberbarn or Numbergarage.com	
7344237894	\$25,995.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344237896	\$25,995.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344237897	\$25,995.00	Gift card offer for entering information, press 1 to speak with agent now.	x
7344238552	\$25,995.00	Gift card offer for entering information, press 1 to speak with agent now.	x
9892901111	\$449.98	Busy signal	
5172376666	\$449.98	Busy Signal	
2312616666	\$449.98	Busy signal	

Compiled by MPSC Staff

Total Recorded Responses Requesting Caller Information	Percentage of 50 test calls
35	70%

Attachment C

NumberBarn website screenshot example of consecutive numbers for sale as of October 17, 2024, in the Michigan 989 area code.

The screenshot displays the NumberBarn website interface. At the top, the header reads "numberbarn Find and buy your new custom phone number". Below the header, there are search filters for "Michigan", "989", and "989 2701". A sidebar on the left provides filtering options for "Area Code", "City", "Category", "Pattern", and "Filter". The main content area shows a grid of phone numbers for sale. The top row is highlighted with a yellow banner for "THE PIG PICK" number (989) 818-5858, priced at \$306.00. Below this, a grid of 40 consecutive numbers is displayed, each priced at \$99.00. The numbers range from (989) 208-2701 to (989) 208-2732. Each number card includes the number, the price, and a "7-10 days to activate" notice with an "Add to Cart" button.

Phone Number	Price	Activation Time
(989) 818-5858	\$306.00	7-10 days to activate
(989) 208-2701	\$99.00	7-10 days to activate
(989) 208-2702	\$99.00	7-10 days to activate
(989) 208-2703	\$99.00	7-10 days to activate
(989) 208-2704	\$99.00	7-10 days to activate
(989) 208-2705	\$99.00	7-10 days to activate
(989) 208-2706	\$99.00	7-10 days to activate
(989) 208-2707	\$99.00	7-10 days to activate
(989) 208-2708	\$99.00	7-10 days to activate
(989) 208-2709	\$99.00	7-10 days to activate
(989) 208-2710	\$99.00	7-10 days to activate
(989) 208-2711	\$99.00	7-10 days to activate
(989) 208-2712	\$99.00	7-10 days to activate
(989) 208-2713	\$99.00	7-10 days to activate
(989) 208-2714	\$99.00	7-10 days to activate
(989) 208-2715	\$99.00	7-10 days to activate
(989) 208-2716	\$99.00	7-10 days to activate
(989) 208-2717	\$99.00	7-10 days to activate
(989) 208-2718	\$99.00	7-10 days to activate
(989) 208-2719	\$99.00	7-10 days to activate
(989) 208-2720	\$99.00	7-10 days to activate
(989) 208-2721	\$99.00	7-10 days to activate
(989) 208-2722	\$99.00	7-10 days to activate
(989) 208-2723	\$99.00	7-10 days to activate
(989) 208-2724	\$99.00	7-10 days to activate
(989) 208-2725	\$99.00	7-10 days to activate
(989) 208-2726	\$99.00	7-10 days to activate
(989) 208-2727	\$99.00	7-10 days to activate
(989) 208-2728	\$99.00	7-10 days to activate
(989) 208-2729	\$99.00	7-10 days to activate
(989) 208-2730	\$99.00	7-10 days to activate
(989) 208-2731	\$99.00	7-10 days to activate
(989) 208-2732	\$99.00	7-10 days to activate

(989) 208-2733 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2734 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2735 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2736 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart
(989) 208-2737 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2738 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2739 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2740 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart
(989) 208-2741 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2742 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2743 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2744 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart
(989) 208-2745 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2746 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2747 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart	(989) 208-2748 <small>Signnow, MI</small> \$99.00 <small>7-10 days to activate</small> Add to Cart
(989) 208-2749 <small>Signnow, MI</small> \$99.00	(989) 208-2750 <small>Signnow, MI</small> \$99.00	(989) 208-2751 <small>Signnow, MI</small> \$99.00	(989) 208-2752 <small>Signnow, MI</small> \$99.00

Source: NumberBarn

<https://www.numberbarn.com/search?type=local&state=MI&npa=989&sort=price%2B&consecutive=2>

Attachment D

NumberBarn website display of numbers available in the Michigan 313 area code (city of Detroit) as of October 18, 2024, and Numbers available by rate center/city in the 517 area code as of October 17, 2024.

The screenshot shows the NumberBarn website interface. At the top, there is a search bar with "Michigan" entered, and filters for "(313)" and "e.g. BARN". On the left side, there is a sidebar with the following elements:

- Clear Filters
- Show me: A dropdown menu with options "All available", "For Sale Only", and "For License Only".
- Three checkboxes: "Get it Now", "Find a Block", and "Recently Added".
- A "City" filter section with a search bar and a dropdown menu showing "Detroit, MI (35553)".
- A "Category" filter section with a plus sign.

The main content area features a banner titled "THE PIG PICK" with a cartoon pig illustration. To the right of the banner, the number "(313) 403-" is displayed, with "Detroit, MI" below it. Below the banner, there are two product cards:

- The first card displays the number "(313) 261-0011" for "Detroit, MI" at a price of "\$105.00". It includes a "GET IT NOW" link and an "Add to Cart" button.
- The second card displays the number "(313) 558-0116" for "Detroit, MI" at a price of "\$5.00". It also includes a "GET IT NOW" link and an "Add to Cart" button.

Source: NumberBarn <https://www.numberbarn.com/search?type=local&state=MI&npa=313&sort=price%2B>

Clear Filters

Show me:

- All available
- For Sale Only
- For License Only

- Get it Now
- Find a Block
- Recently Added

City

- Addison, MI (1846)
- Adrian, MI (1839)
- Albion, MI (2015)
- Allen, MI (2073)
- Bath, MI (584)
- Bell Oak, MI (547)
- Blissfield, MI (1686)
- Britton, MI (2067)
- Bronson, MI (662)
- Brooklyn, MI (2024)
- Bundy Hill, MI (2231)
- Burlington, MI (1006)
- Cambria, MI (2183)
- Camden, MI (1466)
- Charlotte, MI (3688)
- Clarklake, MI (340)
- Clayton, MI (594)
- Clinton, MI (1482)
- Coldwater Lake, MI (1737)

THE PIG PICK

(517) 90

(517) 90
Bundy Hill



(517) 797-0011
Hillsdale, MI

\$105.00

7-10 days to activate

[Add to Cart](#)

(517) 295-0170
Howell, MI

\$5.00

[GET IT NOW](#)

[Add to Cart](#)

PRIME SPELLINGS

Unforgettable numbers that let customers easily remember how to reach you.

(517) REALTOR
(517) 732-5867
Portland, MI

\$9,999.00

[GET IT NOW](#)

[Add to Cart](#)

(517) KEY-RATE
(517) 539-7283
Jackson, MI

\$8,036.55

[GET IT NOW](#)

[Add to Cart](#)

(517) NAUGHTY
(517) 628-4489
Onondaga, MI

[BUY](#) [LICENSE](#)

\$5,000.00

Source: NumberBarn <https://www.numberbarn.com/search?type=local&state=MI&npa=517&sort=price%2B>