

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

In the Matter of)	
)	
Combating Illegal Robocalls Through FCC Numbering Policies)	WC Docket No. 26-49
)	
Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources)	WC Docket No. 20-67
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	
Telephone Number Requirements for IP-Enabled Service Providers)	WC Docket No. 07-243

**COMMENTS OF THE
MICHIGAN PUBLIC SERVICE COMMISSION**

Introduction

On March 27, 2026, the Federal Communications Commission (FCC or Commission) released a Notice of Proposed Rulemaking (NPRM) to initiate a proceeding to evaluate whether it should adopt changes to its telephone numbering policies to further combat illegal robocalls originating from those numbers.¹ The NPRM provided for a comment due date 30 days after publication in the Federal

¹ Notice of Proposed Rulemaking (NPRM), WC Docket Nos. 26-49, 20-67, 13-97, and 07-243, (March 27, 2026) available at [FCC-26-17A1.pdf](#).

Register,² with reply comments due 60 days after publication.³ Per the timeline established in the NPRM, the Michigan Public Service Commission (MPSC) respectfully submits these limited comments in response to issues raised in the above captioned proceedings. Silence on a particular issue does not necessarily indicate agreement or acquiescence on that issue.

Reseller Definition and Robocall Certifications

The NPRM seeks comment on the proposal to define resellers of telephone numbers to include all local exchange carriers, commercial mobile radio service providers, and interconnected voice over internet protocol (VoIP) providers reselling or seeking to resell services that include the provisioning of geographic numbering resources.⁴ The NPRM notes that the resale market is often the source of illegal robocall activity.⁵ The MPSC agrees that the definition of reseller should be amended as proposed by the Commission in the NPRM and supports extending robocall certification requirements to all service providers and resellers using geographic numbers.⁶ Expanding the definition to include more provider types and requiring the same certifications would require these providers to comply with the

² The NRPM was published in the Federal Register on May 8, 2026. See 91 FR 25312.

³ <https://www.federalregister.gov/documents/2026/05/08/2026-09134/combating-illegal-robocalls-through-fcc-numbering-policies-implementation-of-traced-act-knowledge>

⁴ NPRM, p 9.

⁵ *Id.* at p 2.

⁶ *Id.* at p 9.

same rules, resulting in a fairer and more transparent marketplace and cutting down on illegal robocall activity.

The MPSC also supports the NPRM's proposal to require all resellers to complete Numbering Resource Utilization and Forecast (NRUF) forms.⁷ Resellers that obtain numbering resources from other service providers should be required to identify the service provider with standardized information including the name, contact information, OCN number, the range of numbers that were obtained, and FCC Form 499 ID numbers. Obtaining this information from both sides of a resale agreement between providers would allow regulators to more easily identify inconsistencies in reporting and enable greater enforcement where warranted.

Intermediate Numbers

As the telecommunications landscape has evolved significantly since the current numbering administration rules were developed, the MPSC believes it is prudent for the FCC to reexamine its rules to better align them with the realities of the technological advancements that have occurred over this time. The MPSC agrees with the Commission's assertion that the intermediate number category for NRUF reporting "is likely not adequately serving current needs."⁸ Upon review of the NRUF data for different companies, the MPSC Staff discovered instances where providers have not supplied enough information to determine which provider is

⁷ *Id.* at p 17.

⁸ *Id.* at p15.

using these resources for the provision of service. Some providers list the company that they have given a number block to while other providers submit variations of the same information, and some leave the field entirely blank. Standardizing the information required in the Notes/Assignee field would provide needed transparency for ascertaining where numbering resources are being used throughout the marketplace.

To remedy this, the NPRM proposes to split the intermediate number category into three subcategories: intermediate assigned, intermediate other, and intermediate available.⁹ The MPSC supports this proposal. Gaining more insight into how the numbers are used within the intermediate category would allow for a more detailed review of the numbering utilization and could translate to more accurate Months-to-Exhaust worksheets and forecasting for additional blocks to avoid opening new central office codes, which accelerates area code exhaust, simply due to limited visibility of inventory and lack of cooperation with downstream resellers.

Consequently, the MPSC also supports the NPRM's proposal to count intermediate assigned numbers as assigned for calculating utilization thresholds for numbering requests.¹⁰ The MPSC further agrees with the NPRM's proposal that the "provider of record" should be responsible for determining the status of its

⁹ *Id.* at p 15.

¹⁰ *Id.* at p 17.

intermediate numbers, and that treating its NRUF forms as deficient when it is unable or unwilling to fulfill the requirement, as proposed, is justified.¹¹

The NPRM also seeks comment on whether to develop an expedited method through which the North American Numbering Plan Administrator (NANPA) can seek additional supporting information for a service provider's usage forecasts.¹² The MPSC Staff has requested information related to providers' forecasted demand only to receive vague answers from the providers on many occasions leading to concerns regarding whether increased demand is driven by needs within the state or if large amounts of numbers are being obtained for other purposes. If the NANPA is permitted to seek additional information regarding numbering forecasts, the MPSC believes that state commissions should have that same ability or be permitted to obtain this information from the NANPA directly.

While the NPRM proposes updates to the intermediate category, the MPSC suggests that large amounts of "aging" telephone numbers found within the NRUF reports pose a potential issue as well. High levels of aging numbers could be an indication of inefficient use of numbering resources, evidence of illegal robocalling activity, or simply a function of spam analytics flagging a provider's numbers used during legitimate business functions. Regardless, current reporting requirements do not allow states to determine the causes for elevated levels of aging numbers. The MPSC believes that revising the NRUF to require service providers to explain

¹¹ *Id.* at p 16.

¹² *Id.* at p 17.

the reason for high levels of aging phone numbers in their inventories would provide the Commission, the NANPA, and state commissions with information on how these resources were used.

NRUF Access

The NRUF reporting database is one of the few databases states can access to review number use in the North American Numbering Plan (NANP) and, despite its current limitations, has been an invaluable tool for state commissions for years. With this NPRM, the FCC seeks comment on whether it should grant state commissions access to out-of-state provider-specific data.¹³ The MPSC believes that granting cross-jurisdictional access to NRUF data, subject to the same confidentiality standards currently imposed for states to access in-state data, would benefit the numbering regulatory landscape and is in the public interest. Currently, state commissions are limited in what they can share in collaborative meetings with other states in discussing numbering issues due to the fact that they have NRUF access restricted to their own jurisdictions. This limitation also includes sharing the names of providers. Having a larger pool of both information and knowledgeable participants would accelerate the identification of trends in the marketplace and can reveal questionable uses of numbering resources. Ensuring that the data is still protected by confidentiality standards that the states have

¹³ *Id.* at p 24.

proven to abide by would enable cross jurisdictional conversation to better identify and combat bad actors in the space.

Bases for Withholding Numbering Resources

In this NPRM, the FCC seeks comment regarding delegating greater authority to state commissions to restrict access to numbering resources.¹⁴ The MPSC supports delegating additional authority to state commissions to restrict access to numbering resources. Current FCC rules provide limited authority for states to intervene when providers apply for resources centered around state registration requirements.¹⁵ With such narrow circumstances applied to the denial of applications for numbering resources, states often have few options to stop or slow the assignment of resources to providers that are suspected of abusing the system. This results in a subset of providers obtaining their requisite registrations and approvals at the federal and state levels to then obtain numbers at an unsustainable rate, expediting number exhaust. The MPSC Staff has observed that some interconnected VoIP providers employ large forecasts and 30-day notices to act as the basis for their demand, provide scant details concerning the use and plans for these resources, and in some cases seek bountiful resources from rate centers with minimal populations. A lack of meaningful information being provided to regulators with delegated authority to review these matters prevents state

¹⁴ *Id.* at p 25.

¹⁵ 47 CFR 52.15(g)(3)(ii)(B)

regulatory bodies from thoroughly analyzing the assignment of numbering resources. Additionally, while the MPSC Staff has found that most providers have been cooperative and willing to work with the MPSC Staff and the NANPA to find and transfer an available open code when seeking an initial local routing number in order to conserve numbering resources rather than opening a new central office code, this cooperation is not required, and the MPSC does not have any recourse when an interconnected VoIP provider refuses to accept a transferred code to establish a local routing number and provides no valid reason for the rejection.

The MPSC also notes that the FCC reviews and provides approval of initial applications for interconnected VoIP providers to obtain numbering resources based on the information the company has provided in its application, however issues of the potential misuse of numbering resources may not become readily apparent until a provider files its 30-day notice for numbering resources with the state commissions, or a non-VoIP provider begins to request numbers directly through the NANPA. State commissions are familiar with the geography and population areas of their states and can flag questionable requests for numbers and seek additional information from those providers.

Additionally, the short, 7-day processing time NANPA is allotted to process a numbering application can make information gathering attempts less effective than they could be. State commissions understand that processing these applications in a timely manner is necessary for provisioning service in today's fast-paced marketplace; however, allowing state commissions to intervene in this process,

without penalizing the NANPA for missing processing deadlines when a state intervenes, could assist in obtaining information. Allowing state commissions to intervene could also increase transparency, provide leverage for obtaining said information, and aid in safeguarding the finite resources that make up the NANP.

The NPRM also proposes that service providers intending to obtain numbering resources for the first time from the NANPA, as well as resellers of telephone numbers intending to become operational, should be required to file certifications at least 30 days prior to submitting their first request for numbering resources to the NANPA or beginning to resell service.¹⁶ The MPSC supports this proposal and requests that state commissions be included in these notices. This would grant states additional time to ensure providers are compliant with state requirements prior to the 7-day NANPA processing timeline being activated.

The MPSC has also observed that some interconnected VoIP providers appear to utilize the 30-day notice process to avoid the more stringent metrics required for growth blocks. That is, some providers request a single block from every rate center in a Number Planning Area or several Number Planning Areas rather than go through the process to create a realistic forecast based on their current and future demand and accounting of their months to exhaust and utilization rates to apply for growth blocks where needed. These growth blocks have a greater threshold for approval than initial blocks. The current methodology

¹⁶ *NPRM* at p 10.

used for an interconnected VoIP providers' 30-day notice permits a provider to potentially obtain hundreds of thousands of telephone numbers at any time with little to no oversight in perpetuity. The MPSC believes that implementing some guardrails to deter this behavior would help extend the life of the NANP through fewer central office codes being opened in rural areas and reducing the available pool of easily accessed geographic phone numbers used for robocalling. Requiring responsive, honest communication between providers and state commissions would assist state commissions in executing the delegated authority extended by the FCC.

State commissions should also have the authority to instruct NANPA to deny or delay numbering applications when the applications present issues that appear to circumvent numbering guidelines, orders, and laws when a provider requests numbering resources. Imposing a limit on how long a 30-day notice is valid would also require providers to reassess their numbering needs on a semi-regular basis outside the biannual NRUF reporting requirements and help to ensure notices continue to contain current information for administrative purposes.

Additional FCC Action to Deter Non-compliance

The National Association of Regulatory Utility Commissioners published a Numbering White Paper that suggests the Commission already has the authority to audit service providers for compliance with numbering administration rules both for cause and randomly.¹⁷ The MPSC believes that the Commission should use its

¹⁷ NARUC, Perspectives and Recommendations on How Telephone Number Conservation Can be Enhanced and Extend the Life of the North American Number

auditing authority to investigate several suspected activities such as violations of numbering administration rules, possession of large amounts of aging telephone numbers, and the sale of telephone numbers. Additionally, the Commission should reinforce its position that numbering resources are not the property of service providers and numbers cannot be sold.¹⁸

The MPSC has previously submitted comments to the Commission with regard to the application of Numberbarn, LLC which illustrated the number of Michigan-based phone numbers that were being sold on the platform, and opined that these practices do not adhere to industry guidelines.¹⁹ The MPSC continues to believe that numbering resources are a public resource and should not be sold or hoarded, and requests that the Commission promulgate a rule to explicitly prohibit the sale of numbering resources. The Commission should also permit states to direct NANPA to deny number applications if a state commission can demonstrate that a provider is offering all or a portion of their numbering resources to entities that sell numbers.

Plan (NANP) and Reduce Illegal Robocalling Activity, p.15, available at <https://pubs.naruc.org/pub/OCFAB9E5-CC00-D558-D278-2CBA85370EB1> (citing CFR § 52.15(k)). The Thousands Block & Central Office Code Administrative Guide (TBCOCAG) references the FCC's auditing authority. TBCOCAG, § 2.3.

¹⁸ See NARUC Numbering White Paper, p. 15.

¹⁹ Comments of the Michigan Public Service Commission, FCC Docket No. WC 19-99, 11/8/2024, available at <https://www.fcc.gov/ecfs/document/1108165108539/1>.

Conclusion

While the current numbering administration rules and databases performed well when developed, technology has changed rapidly since their implementation. As state commissions, NARUC, and the North American Numbering Council have cited in comments and reports to the Commission, the intermediate classification of phone numbers has created issues with ascertaining utilization rates and traceback efforts. The MPSC supports the FCC's proposal to expand this classification to provide more transparency in the marketplace.

To bolster these changes and oversight of numbering resources, the MPSC also supports the FCC's proposal to allow greater access to NRUF reports. Allowing the greater sharing of information between state commissions protected under confidentiality would assist in tracking trends in the numbering space and identifying misuse of numbering resources.

Along with greater access to NRUF reporting and more robust databases, granting states further authority to delay or withhold numbering resources from providers suspected of fraud and abuse would also aid states in utilizing their delegated authorities to assist in eliminating fraud and abuse in the telecommunications industry. This would reduce strain on the NANP and the need to commence area code relief proceedings due to numbering exhaust. The Commission should utilize its authority to enforce current numbering rules and extend current requirements to a greater subset of providers. The MPSC appreciates the opportunity to submit comments on this proceeding.

Respectfully submitted,

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COMMISSION**

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