

Process for Voice over Internet Protocol Providers' Direct Access to Telephone Numbers

On June 22, 2015, the FCC released the *Direct Access Report and Order*¹ establishing a process by which the FCC will authorize interconnected Voice over Internet Protocol (VoIP) providers to obtain telephone numbers directly from the Administrators of the North American Numbering Plan ("Numbering Administrators") rather than through intermediary telecommunications carriers.

FCC approval is required before a VoIP provider seeks state numbering resources. The FCC's Order requires that before interconnected VoIP providers seek numbering resources from the Numbering Administrators, they must get "Numbering Authorization Applications" approved by the FCC. Among other conditions of authorization for direct access to telephone numbers, VoIP providers must give states a minimum of 30-days' notice prior to seeking numbering resources in the state.

If the applicant satisfies the initial procedural review, FCC staff will assign the application its own docket number and will release an "Accepted for Filing Public Notice" seeking comment on the application. On the thirty-first (31st) day after the Accepted for Filing Public Notice is released, the application will be deemed granted unless the Bureau notifies the applicant that the grant will not be automatically effective. Once an interconnected VoIP provider's Numbering Authorization Application is deemed granted, the applicant can immediately provide states from which it intends to request numbers the required 30-day notice.

On December 30, 2015, The National Pooling Administrator released Change Order 2 regarding *Issue 497: VoIP Service Providers' Access Requirements for NANP Resource Assignments and Issue 797: Updates to the INC Guidelines Forms*, which includes a template that VoIP providers may use to provide states with the 30-day notice of their intent to seek numbering resources within a state. VoIP providers seeking direct access to numbering resources within Indiana may use this template (attached) with the completed information provided on company letterhead to provide the Indiana Utility Regulatory Commission (IURC) with the required 30-day advanced notice of intent to seek direct access to telephone numbers within Indiana.

Indiana law requires that VoIP providers offering communications service in Indiana obtain a Certificate of Territorial Authority (CTA). Indiana Code 8-1-32.5-6 requires that a person or entity seeking to provide communications services in Indiana file an application for a CTA with the IURC. Communications services are identified in Indiana Code 8-1-32.5-3 which includes VoIP. Additionally, Indiana Code 23-15-1 requires any person or entity engaged in or transacting business in Indiana to register with the Indiana Secretary of State. Proof of registration is a requirement for a CTA.

This information should be sent via email to designated state commission staff at:

IURCCommunications@urc.in.gov.

¹ *Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd 6839 (2015) (*Direct Access Report and Order*).

Thousands-Block Pooling Administration Guidelines (TBPAG)

Appendix 7 Revised: November 6, 2015

Template for 30-day State Notification for Interconnected VoIP Providers

Letterhead of the applicant

Date

Appropriate Public Utility Commission address

Dear _____:

Pursuant to the Federal Communications Commission's FCC 15-70 Order, allowing interconnected VoIP providers to obtain resources directly from the North American Numbering Plan Administrator and/or the Pooling Administrator, _____ hereby notifies this Commission of its intent to request the resources identified below (or in attached). We are providing this notice at least 30 days prior to requesting numbers from the Numbering Administrators.²

Applicant's IPES OCN	NPA	Rate Center(s)	Initial/Growth	Quantity of Thousands-Blocks	Quantity of CO Codes

In addition, below is our regulatory and numbering contact information as required³:

Regulatory Representative:

Name:

Address:

E-mail:

Phone:

Numbering Representative:

Name:

Address:

E-mail:

Phone:

Further, we understand that we must provide any changes to the contact information within thirty (30) days.

Signature

² 47 CFR § 52.15 (g) (3).

³ 47 CFR § 52.15 (g) (3) (iv).