

March 9, 2020

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: *Wireline Competition Bureau and Consumer and Governmental Affairs Bureau Seek Comment on Technical Requirements for Reassigned Numbers Database (CG Docket No. 17-59)*

Dear Ms. Dortch:

The American Financial Services Association (AFSA)¹ appreciates the opportunity to comment on the Technical Requirements Document (TRD) for the Reassigned Numbers Database (RND) recently approved by the North American Numbering Council. The TRD describes the technical responsibilities of the contractor that the Federal Communications Commission (FCC) will select to administer a database of telephone numbers that have been permanently disconnected from their current subscriber and are available for reassignment to another consumer.

AFSA is pleased that the FCC is addressing the problem of unwanted calls to consumers with numbers reassigned from a previous consumer. We strongly support the establishment of a single, comprehensive database that will contain reassigned number information from voice service providers. The RND will enable a caller to determine whether a telephone number has been reassigned and thus avoid calling consumers with reassigned numbers who may not wish to receive the call.

The TRD is thorough and addresses many key issues. For instance, we support the FCC's decision to ensure that the design of the reassigned number database supports a safe harbor from Telephone Consumer Protection Act liability for those callers that rely on the database to learn if a number has been reassigned. We also agree that callers should have the ability to download the query report data to an Excel[™] or .CSV format. And, we appreciate that confirmation will be provided to the caller. Overall, we believe that the TRD is well-thought out and includes many recommendations provided to the FCC from calls.

Nonetheless, we have two suggestions that we hope the FCC will consider. First, the RND needs to have additional system query capability. Second, the FCC should ensure that the RND can process a high volume of queries submitted by callers.

On the first point, the RND should provide additional information to callers. Currently, the TRD states that a query will return a "no" if the date provided by the caller is subsequent to the permanent disconnect date that is contained in the reassigned numbers database (*i.e.*, the number has not been permanently disconnected), a "yes" if the date provided is prior to the permanent disconnect date contained in the reassigned numbers database (*i.e.*,

¹ Founded in 1916, AFSA is the national trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including traditional installment loans, mortgages, direct and indirect vehicle financing, payment cards, and retail sales finance.

the number has been permanently disconnected), or a response of “no data” if the number nor a permanent disconnect date is contained in the reassigned numbers database.

In a previous request for comment, the FCC outlined the four steps in a number reassignment process: (1) a number currently in use is disconnected, (2) the number is aged, (3) the number is made available for assignment, and (4) the number is assigned to a new subscriber. It would be helpful for callers to know whether a number was in step 1, 2, 3, or 4.

Furthermore, AFSA asks that the RND identify when the number was disconnected and when it was assigned to a new subscriber. In other words, when the RND is queried as to whether a number has been reassigned or disconnected and the answer is “Yes, it has been reassigned,” the answer should also include information such as, “The number was disconnected on Month, Day, Year,” and “The number was reassigned on Month, Day, Year.”

Both elements should be part of the standard data fields. For instance, when a caller queries the RND, it should return the following data fields: “Date last disconnected” and “Date last reassigned.” Those data points should be provided in response to any query so the caller can identify whether the number has been disconnected and/or reassigned at any point.

On the second point, the RND must be able to process a high volume of queries and provide a response to each query quickly. There are several thousand financial institutions in the United States who will likely be using the RND. And that’s just one sector of the American economy. It is likely that retailers, healthcare providers, and others will also query the RND. Each of these entities has thousands, if not millions, of customers. Any contractor selected to establish the RND must anticipate a high volume of queries and adequately prepare for it.

* * *

We appreciate the FCC’s efforts to establish the RND and are pleased that the FCC has requested feedback every step of the way. Our members look forward to using the RND, hopefully in the near future. Please do not hesitate to contact AFSA if you have any questions regarding his candidacy. You may contact me at 202-776-7300 or cwinslow@afsamail.org.

Sincerely,



Celia Winslow
Senior Vice President
American Financial Services Association