



**Public Service Commission of the District of Columbia**

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**Betty Ann Kane**  
Chairman

July 13, 2015

Mathew DeNero  
Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

RE: "Geographic Routing of Toll Free Services" White Paper

Dear Mr. DeNero:

This is to advise the Federal Communications Commission ("FCC") that the North American Numbering Council ("NANC"), at its June 4, 2015 meeting, unanimously concurred with the recommendation of the Future of Numbering Working Group ("FoN") to transmit the "Geographic Routing of Toll Free Services" White Paper ("White Paper") to the FCC.

The FoN Working Group prepared this White Paper to call attention to certain problems with respect to geographic routing of toll free services, resulting from new technologies and evolving numbering policies, including transition to an all Internet Protocol ("IP") network.

The NANC has not voted the content of the White Paper. The document incorporates claims related to Section 222, legal arguments related to Customer Proprietary Network Information ("CPNI"), and other analyses that the NANC has not considered in depth nor taken any position thereon. It reflects the output of efforts of the FoN Working Group, and the NANC, having reviewed the White Paper, has reached agreement that its transmittal to the FCC may be informative.

Please feel free to contact me or the FoN Working Group Tri-Chairs: Carolee Hall, Idaho Public Utilities Commission ([Carolee.Hall@puc.idaho.gov](mailto:Carolee.Hall@puc.idaho.gov)); Dawn Lawrence, XO

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Communications ([dawnr13@yahoo.com](mailto:dawnr13@yahoo.com)); or Suzanne Addington, Sprint ([Suzanne.M.Addington@sprint.com](mailto:Suzanne.M.Addington@sprint.com)), if you or members of your staff have any questions regarding the White Paper.

Sincerely,

A handwritten signature in black ink that reads "Betty Ann Kane". The signature is written in a cursive, flowing style.

Betty Ann Kane  
Chairman  
North American Numbering Council

Attachments (1)

cc: Kris Monteith, FCC  
Ann Stevens, FCC  
Marilyn Jones, FCC  
NANC Members