



Closing the Accountability Loop: IPES, the Reseller Reporting Gap, and the Operational Reality of Number Fraud in an All-IP World



Involved in Numbering Since 1996

- Primary author of the industry's NPAC CMIP Interface.
- Founded 10x People to streamline numbering processes.
- Active members of industry numbering groups.

Today we will discuss:

- The history of numbering and the recent acceleration of changes.
- How the FCC plans to use numbering to solve robocalls.
- Are we headed for Universal Direct Numbering Access, and what would that take?
- The Dos and Don't's for navigating our new regulatory environment.



1996-2024 Numbering Foundation

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Milestones Years Apart

1998

Wireline number porting

Local portability begins

1999

Number pooling introduced

Efficient number allocation

2003

Wireless number porting

Extended to mobile carriers

2007

Interconnected VoIP porting

VoIP providers included

2015

VoIP DNA: first Report and Order

Direct numbering access begins

2023

VoIP DNA: second Report and Order

Framework expanded

2025-2026 Rapid Exceleration

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FCC actions in 18 months

2025

VoIP DNA: third R&O

FCC 25-86, IPES recert

2026

Compliance guide issued

Small entity guide, DA 26-375

2026

Reseller rules proposed

March reseller NPRM

2026

KYC

FCC 26-27

2026

KYUP

FCC 26-32

2026

RMD database proposed

FCC 26-49 FNPRM

The Convergence

Three FCC threads are converging to closing the visibility gap on who's actually originating and moving traffic.

- KYC FNPRM adopted April 30
- KYUP FNPRM adopted May 20
- Numbering Reseller Obligations codified in FCC 26-17 (March reseller NPRM)

This is a large package moving in parallel with other initiatives

Watch: Definition Changes, Not Just Rules

- The role in the call path is becoming the deciding factor
- Where the focus was on IPES, a new, expanded definition of “Voice Service Provider” reaches further
 - Defined in the March reseller NPRM
 - Doubled down in the July NFPRM, FCC 26-49 (Improving the Effectiveness of the RMD).
- Hundreds of UCaaS and CPaaS providers are now potentially subject to rules changes.
- Will these direct end-to-end users bear the same regulatory burden proposed in FCC 26-49?

Watch: Enforcement Signals

- State-level parallel motion.
- FCC Actions and Proposals:
 - Delisting 1,200 providers from the RMD database.
 - \$2,500 per call penalty for KYC & KYUP violations.

Watch: Numbering Visibility Requirements

- KYC and KYUP are a given.
- The FCC and State Commissions don't have visibility into who's actually using intermediate and wholesale numbering.
- Underlying providers have resisted due to competitive reasons.
- NRUF and RMD reporting have been proposed.

How Do We Get Visibility

- Carriers with Direct Numbering Access must track number assignment and meet regulatory requirements (NRUF, RND).
- The only dynamic database in the numbering ecosystem is the NPAC. Should it be leveraged?
- Is the FCC aiming for Universal direct numbering access?

Will everyone who falls under the new VSP definition be made to seek direct numbering access?

What does Direct Numbering Access Take

The requirements at a glance are:

25 Steps

Eligible providers must complete a comprehensive 25-step process, from filing the FCC IPES authorization to launching operational reporting and audit-ready records. They must also choose between two paths: build or partner?

15 Forms & Filings

There are fifteen required forms and filings, many of which require comprehensive inventory and reporting competencies. In the new regulatory environment, these will need to be completed regardless of direct access.

12 Months to Compliance

On average, we anticipate the full IPES enablement process under the 2023 Direct Access Framework to take up to 12 months, and considering the expected 2028 deadline, that means the clock to compliance is ticking.

Don't:

- ✗ Get distracted or overreact
- ✗ Treat proposed rules as final.
- ✗ Assume your classification protects you.
- ✗ Wait for compliance deadlines to start.

Do:

- ✓ Start taking action now.
- ✓ Close your own visibility gaps.
- ✓ Start KYC data collection.
- ✓ Start KYUP to audit and formalize upstream provider relationships.
- ✓ Assign clear ownership across your organization.
- ✓ Understand direct numbering access, systems & requirements.
- ✓ Consider engaging in the record.

The providers that come out ahead here aren't the ones who guess right on the final rule text, they're the ones who build the visibility and habits now that any version of these rules will require.

Q&A