Frequently Asked Questions regarding the Reassigned Numbers Database

March 4, 2022

For Callers (Users) and Caller Agents (User Agents)

1) What is the RND?

The Reassigned Numbers Database (RND) system securely houses all permanently disconnected US geographic and toll-free numbers, and the date of the most recent permanent disconnection of each of those numbers. The RND is a pre-paid, subscription-based service for Callers and Caller Agents.

The RND was created in the Federal Communications Commission's (FCC's) <u>Second Report</u> and <u>Order on Advanced Methods to Target and Eliminate Unlawful Robocalls</u> (RND Order) and is administered by the RND Administrator (RNDA).

2) Who is populating this Database?

Every service provider that obtains North American Numbering Plan US geographic telephone numbers from the North American Numbering Plan Administrator (NANPA), including those providers that receive their numbering resources indirectly, are required to report permanently disconnected numbers. The Toll-Free Numbering Administrator is required to report permanently disconnected for toll-free numbers. All large and medium sized voice providers began reporting their permanently disconnected numbers on April 15, 2021; remaining small voice providers began reporting disconnects starting October 15, 2021.

3) How many numbers are currently in the RND?

Voice providers were required to begin identifying telephone numbers that were permanently disconnected on July 27, 2020, and required to report those disconnected numbers on April 15, 2021, and each month thereafter. Smaller providers began tracking permanent disconnects starting January 27, 2021, and began reporting their disconnects on October 15, 2021, and each month thereafter. The RND currently contains over 200 million geographic and toll-free numbers. That number will continue to grow as carriers report disconnections each month.

4) Why should I use this Database?

The FCC created this Database as part of a multi-prong approach to address the problem of unwanted calls to consumers with numbers reassigned from a previous consumer.

Using the RND, enterprises and other entities are able to determine whether a telephone number has been permanently disconnected from the consumer they intend to reach, thus allowing them to avoid calling or texting consumers with potentially reassigned numbers who may not wish to receive the call or text.

Third-party contractors, Caller Agents, who want to scrub calling lists or provide the capability to place autodialed or prerecorded or artificial voice calls or texts may use this Database on behalf of their clients.

5) What is a permanently disconnected telephone number?

A permanent disconnection occurs when a subscriber has permanently relinquished a number, or the provider has permanently reversed its assignment of the number to the subscriber. Upon disconnection, providers must report the telephone number to the RND and then age the telephone number for at least 45 days prior to reassigning the number.

The complete definition of permanent disconnect is:

Occurs when a subscriber permanently has relinquished a number, or the provider permanently has reversed its assignment of the number to the subscriber such that the number has been disassociated with the subscriber for active service in the service provider's or Toll Free Administrator's records. Permanently disconnected numbers therefore do not include instances where the phone number is still associated with the subscriber, such as when a subscriber's phone service has been disconnected temporarily for nonpayment of a bill or when a consumer ports a number to another provider. A ported number remains assigned to and associated with the same consumer even though a different provider serves the consumer after the number is ported. (FCC 18-177, ¶38).

6) Who are Callers and Caller Agents?

The term "Caller" is identified in the Order to include, but is not limited to, a person or entity that initiates any call using a wireless, wireline, or interconnected VoIP service. Caller is a designated user type that will use the Database directly and query numbers that it wishes to lawfully call or text. The terms User, Callers, and Querying Parties are used interchangeably.

Caller Agents are third-party contractors that Callers can contract with to query the Database on their behalf. For more information on finding a Caller Agent, click <u>here</u>.

7) Who should use this Database?

All enterprises, large and small, and other entities such as schools, health care providers, and others who regularly contact their customers (via outbound calls or texts) and want to ensure the numbers in their contact lists have not been disconnected since the date each customer provided consent to be contacted on that number.

8) What are the benefits of using the RND?

Using the RND can give you a safe harbor from liability for certain calls under the Telephone Consumer Protection Act (TCPA). The TCPA and the Commission's rules regulate some kinds of telephone calls. For certain calls, including those made with an autodialer or those using an artificial or pre-recorded voice, the caller needs to get the prior express consent of the called party. But if the person you think you're calling gives up their phone number and that number is reassigned to someone else, you'll reach the wrong person, someone you probably don't have consent to call. The RND is helpful because it gives you a way to check to see if the person you want, and have consent, to call is still at that number. If someone files suit under the TCPA, you can respond by showing that you had obtained consent to call the number and that you checked the latest update of the RND before calling and it said the number had not been reassigned after you obtained consent. Please note that the burden of proof is on the caller.

9) I only text my customers, may I use this Database?

Yes, the FCC Order covers enterprises that call and/or text their clients.

10) When can I register to use the RND?

Interested Callers and Caller Agents can send an email to <u>support@reassigned.us</u>. In the email, please provide the type of "user" you will be—Caller or Caller Agent. Subscription pricing is located under <u>https://www.reassigned.us/pricing</u> and will be available starting November 1, 2021. Please see the website instructions at <u>https://www.reassigned.us/</u> under Query tab, for information about Registration, Pricing and User Guides for Caller Registration, Querying, SFTP and API documentation.

11) Is using the RND mandatory?

Use of the RND is not mandatory, but the RND provides benefits to calling parties. In addition to avoiding the hassle of calling the wrong person, the caller may take advantage of the safe harbor defined in the RND Order and explained in FAQ #8 above.

The FCC's RND has also been noted in a new rule from the Consumer Financial Protection Bureau that requires debt collectors to first check a complete and accurate database before sending a text to a telephone number, and the FCC's RND is noted in the rule as qualifying as a complete and accurate database. The rule is effective November 1, 2021.

12) If I registered for Beta, do I need to re-register again once it goes live?

No. However, starting November 1, 2021, in order to query the Database, users will need to select and pay for their subscription. Please see the directions outlined in the <u>Caller/Caller Agent</u> <u>Registration Guide for the Reassigned Numbers Database</u>.

13) What data do I need to query the Database?

You will need the telephone number you want to call/text as well as the date of consent.

14) What is the "Date of Consent"?

You can use the date when you obtained consent from the consumer to call the number, or you can use a past date on which you are reasonably certain that the consumer could still be reached at that number. For example, you might select the date when you last spoke to the consumer at that number or the date the consumer last updated their contact information.

15) When I query the Database, what do the responses mean?

The RND provides three possible responses:

"Yes" means that the Safe Harbor does not apply because the telephone number queried has been permanently disconnected on or after the date of consent. A "Yes" means the queried number is contained in the database and the date the Caller provides in the query is the same as or before the permanent disconnect date for that number in the RND. (i.e., the number has been permanently disconnected during the time period). Example: 8505551301 was disconnected 2/11/2021. If Caller queried with 1/11/2021, result will be "yes"

"No" means that Safe Harbor may apply because the telephone number queried has not been permanently disconnected since consent was provided or if the number was not permanently disconnected and the date of consent is on or after January 27, 2021. A "No" means the queried number is contained in the database and the date the Caller provides in the query is after the permanent disconnect date contained in the database, or if the number is not in the database and the date the Caller provides is not in the database and the date the Caller provides were required to the date the Caller provides is on or after January 27, 2021, the date all providers were required

to maintain records of the most recent date each number was permanently disconnected. (i.e., the number has not been permanently disconnected during the time period). Example: 9105551301 was disconnected 2/11/2021. If Caller queried with 7/11/2021, result will be "no"

"No Data" means that No Safe Harbor applies because the telephone number was not permanently disconnected and the date of consent was prior to January 27, 2021. A "No Data" means the queried number and a permanent disconnect date are not contained in the database and the date provided in the query is before January 27, 2021, the date all providers are required to maintain records of the most recent date each number was permanently disconnected numbers to the RND (i.e., the database does not contain either the date or number data queried by the Caller).

Example: 2075551301 - TN has not been disconnected. If Caller queried with 12/30/20, result will be "no_data"

16) Can I be both a Caller and a Caller Agent?

Yes, separate login credentials will be required.

17) I have multiple clients that would have the same TN, can I just query the Database once?

No, because each query must be made against the respective CompanyID for the client to support against TCPA claims.

18) Can I have more than one Primary Contact?

For the initial registration, there can only be one Primary Contact. Once that Primary Contact has invited users, the RNDA can promote the invited users to also be Primary Contacts.

19) Who must sign the Letter of Authorization?

The Letter of Authorization (LOA) allowing the Agent to query the RND on behalf of a client company must be signed by the client company and the client company's email and telephone number must also be indicated on the LOA. A template LOA can be found <u>here</u>.

20) Who is an Authorizer?

The Authorizer must be someone from the same company, in order for the RNDA to verify the Primary Contact works for the registering company.

21) How do I become a listed Agent on the website?

As long as the Agent is registered in the RND, they can be included to be listed on <u>www.reassigned.us</u> under Agents/Find an Agent.

22) Am I limited in the number of client companies I have?

There is no limit as long as Letters of Authorization have been provided for each client.

23) How many telephone numbers (TNs) can I query at the same time?

Large queries can be made through file uploads via the Web GUI, SFTP and API and queries of 50 or less telephone numbers can be made as a single event directly through the Web GUI.

- Users may query up to a max of 50 TNs as a single event via the Web GUI.
- Users may query up to a max of 1,000 TNs as a single API call when using the API
- Users may upload a file via the Website upload, API or SFTP that will allow the user to query up to 1Million TNs per file.

The maximum number of queries will ultimately be based on the size of the subscription the user purchases.

24) Is there an automated process?

Yes, both API and Secure Fire Transfer Protocol (SFTP) mechanisms will be available. For more information go to <u>https://www.reassigned.us/resources/guides</u>

25) Will I be notified once my query report is ready?

Yes, via email, you will be notified that the result file can be downloaded. Please note that a query of up to 50 Telephone Numbers will also yield an immediate response that can be viewed on the screen, as well as in the downloadable result file. Automation directions for retrieving query results can be found in Section 2.6 of Caller API User Guide for the Reassigned Numbers Database.

26) What is the difference of the TN Query and Query Summary Report?

A user can run a report on a specific Telephone Number or Numbers using the TN Query Report.

A user can run a report providing the amount of queries made for a specific time period using the Query Summary Report.

27) For the query report, can we have more than one person notified?

Yes, if the query file (.XLSX or .CSV) uploaded contains additional contacts on Row 1. Please see the Query User Guide located at <u>https://www.reassigned.us/</u> under Resources/Guides.

28) What is the pricing for using this Database?

Initial subscriptions tiers and associated pricing have been established for General Availability starting November 1, 2021. Querying access to the RND is through a pre-paid tiered, subscription-based fee structure. The tiers are based on the number of queries the subscriber (Caller and/or Caller Agent) anticipates making in the RND and the subscription shall be based on the period during which the subscriber may make the queries.

Each tier shall be associated with a flat-rate amount, charged at the beginning of the period, and which covers the volume of queries during that period up to the upper query volume limit.

The RND initially has six subscription tiers: extra-small, small, medium, large, extra-large, and jumbo. Those wishing to use the RND may sign up for a one-month subscription, a three-month subscription, or a six-month subscription. In time, the RND Administrator (Administrator) expects to offer an annual subscription option as well.

Starting November 1st, if you are a new registrant or have previously registered as a Caller or Caller Agent during the Beta Test Period, you will see the subscription options when logging into the RND. Please see <u>https://www.reassigned.us/pricing</u> for current pricing.

29) Can I get a local instance of this Database?

No.

30) What if I queried the wrong number, do I get a credit?

No.

31) What are the subscription terms?

There are currently three terms—1-month, 3-months, and 6-months. Eventually, the RND will support annual subscriptions. In the case of subscribing to a 3-month or 6-month term, the queries can be used at any point during that term, although if there are any left-over queries when the term ends, they will not carryover.

32) Is there auto-renewal for billing available?

Yes.

33) Am I charged for each query?

You will purchase a subscription for a set amount of queries in advance of making any queries in the RND. The RND will track each query against your selected subscription and will notify you once you have queried 75% of your subscription volume, as well as when you have run out of queries. You will have the opportunity to increase your subscription if you need to make more queries than allowed by your original subscription. Each TN queried, regardless of whether the query is made via the RND User Interface, via an API Call or via an API or SFTP upload, counts as 1 query.

34) When I submit my query, it says it's a "billable transaction", I thought I had a subscription and was not paying for each query?

Correct. It is a billable transaction in the sense that each query counts against your pre-paid subscription query amounts.

For Service Providers and Service Provider Agents

1) When are Service Providers (SPs) required to maintain records of permanently disconnected numbers and report them to the Reassigned Number Database (RND)?

See Public Notice, DA 20-706, at <u>https://docs.fcc.gov/public/attachments/DA-20-706A1.pdf</u> requiring SPs to start maintaining records beginning July 27, 2020, and See Public Notice, DA-21-134, at <u>https://docs.fcc.gov/public/attachments/DA-21-134A1.pdf</u>, requiring initial seed data to be reported to the RND beginning April 15, 2021, and smaller providers to report initial data beginning October 2021.

2) Do I report disconnected Toll Free numbers in the same file as geographic TNs?

You only report on disconnected geographic Telephone Numbers (TNs). The Toll Free Number Administrator (TFNA) is responsible for reporting on disconnected Toll Free numbers.

3) Am I only responsible for reporting disconnected TNs for resources assigned by the NANPA and PA?

You are responsible for reporting on disconnected numbers from all numbers allocated to you, including any numbers ported in to you and any numbers you received from another telecommunications provider.

4) When is the monthly report due, and will ongoing monthly submissions be incremental or cumulative?

The report can be submitted as early as the 11th of the month but no later than 11:59am ET by the 15th of each month. While the data should be as current as possible, not all service providers will be able to report numbers disconnected through the 15th of the month by the 15th of the month. The cutoff data for the data in the monthly file should include disconnects at least through the 10th of the month. If there are disconnects that occur after the 10th of the month, it is acceptable for those disconnects to be included in the next monthly report. Any number that is permanently disconnected after the cutoff for the monthly file should be included in the following month's file.

The ongoing monthly submissions will be incremental.

5) If reporting is incremental, how will a permanently disconnected number be removed from the database after it's reassigned?

The requirement is for SPs to report disconnected numbers; there is no requirement or process for removing previously reported numbers from the RND. The RND is not a database of currently disconnected telephone numbers. The purpose of the RND is to allow a Caller to find out if the number has been disconnected, and potentially reassigned, since the date when the Caller received consent to call the number. The numbers need to stay in the RND even after they've been reassigned.

The requirement is only to report permanently disconnected numbers to the RND, incrementally, on a monthly basis. As an example, a number permanently disconnected on October 16, 2021 will be reported to the RND by November 15, 2021. Because that number must be aged for 45 days after the permanent disconnection, it cannot be reassigned until after November 30, 2021. The consumer previously assigned that number will be protected because Callers will be expected to query the database each month indicating the telephone number and date of consent each time. Please also see the definition of permanent disconnect as defined in FCC 18-177, ¶38.

6) How do I get a Company ID?

You can determine your own Company ID or can have the RND Administrator assign a Company ID during registration. The Company ID must be a minimum of 3 and maximum of 10 characters. Alpha and numeric is acceptable.

7) For the ongoing monthly submissions, if a Company ID has no new disconnected TNs to report since the last monthly submission, does the Company ID still need to submit a report with no data to fulfill the reporting requirement?

Yes, confirmation of no disconnected numbers can be reported by: logging into the RND, under Submit, TN Disconnect Upload, Report No Disconnect Data submitting an "empty" file via the Web upload, or submitting an "empty" file via SFTP Also See Section 3.3.2, Page 9 of the Submit User Guide, located at <u>https://www.reassigned.us/</u>, Resources/Guides

8) With regard to the January 15, 2021 Public Notice, DA 21-67, Technical Specifications, does Attachment A address both initial seed files and the monthly reports, or only initial seed file submissions?

The Attachment A located at <u>https://docs.fcc.gov/public/attachments/DA-21-67A1.pdf</u> refers to the seed files, which must be submitted via the website upload of an Excel file (xlsx) or via a Text file (.csv) although the same method can be used for the monthly ongoing disconnect reports. If submitted via Excel, there is a one million row limitation. Any SP needing to submit more than one Excel file can use the insertion of the "BatchID" on Row 2 of the file. Excel files with tabs will not be accepted.

9) With regard to the sample file formats in the January 15, 2021 Public Notice, are hyphens allowed? And what date format is acceptable?

Hyphens are not allowed, and the Telephone Number field is limited to 10 digits. Acceptable date formats are: YYYY-MM-DD – 2021-04-01 MM/DD/YY - 04/01/21 MM/DD/YYYY - 04/01/2021 M/D/YYY - 4/1/21 M/D/YYY - 4/1/2021

10) Can a SP/SPA can report all company segments under one Company ID?

Yes, The SP/SPA can report all company segments (i.e., wireless, CLEC, VoiP) under one Company ID.

11) When will a SP/SPA be able to upload a file via SFTP in order to avoid having to manually login and upload a file(s) each month?

Starting April 21, 2021, the monthly disconnect reports can be uploaded via SFTP. The Primary Contact must login at https://www.reassigned.us, navigate to Welcome/SFTP credentials, and upload the SSH Public Key in order to obtain the SFTP URL and SFTP Username needed to upload your monthly data via SFTP. A complete SFTP user guide can be accessed under https://www.reassigned.us/resources/guides

12) What is the registration process for the RND?

A Primary Contact is required to complete registration and once the primary contact is registered, the Primary can invite additional users from the company. To request a login, the process will be to send an email to the customer support email for the Reassigned Number Database (RND), indicating the type of registrant (SP or SPA). RND Customer Support will send an email back to the Primary Contact. The email will contain a link to an online registration form which is only valid for the Primary Contact and must be used within one week.

The registration will require contact and company information from the Primary Contact as well as information for the authorizer from the Primary Contact's company. The registration will also require a Company ID consisting of a minimum of 3 and maximum of 10 characters (alpha and numeric accepted). If the Company ID is not provided the RND will assign one. After registering, the Primary Contact, as well as the invited users, can upload the files. After registration, invited users can be transferred and/or elevated to primary contact status and it is possible to have multiple primary contacts for a company.

If necessary, all users can be uploading at the same time if needed in order upload more than one file. Refer to Question 8 above regarding use the "BatchID" process for uploading more than 1 million rows of disconnects.

13) What format should be used to provide a Letter of Authorization (LOA) to the RND?

A Service Provider Agent must indicate its authorization to submit disconnected number reports or updates to the RND on behalf of the Service Provider through its possession of an LOA which must be emailed to the RND Customer Support at support@reassigned.us

The LOA must be on the service provider's company letterhead and must contain a statement authorizing the Service Provider Agent to submit permanently disconnected telephone numbers reports or updates to the RND on behalf of the client service provider.

A template LOA can be accessed at <u>https://www.reassigned.us/agents/become_agent</u>, under <u>Service Provider Agent LOA</u> template.