October 29, 2026

FCC FACT SHEET[*]
Numbering Policies for Modern Communications
Fourth Report and Order and Further Notice of Proposed Rulemaking – WC Docket Nos. 13-97, 07-243, 20-67

Background: This *Fourth Report and Order* and *Fourth Further Notice of Proposed Rulemaking*, if adopted, would be another important step by the Federal Communications Commission (FCC) to protect national security and safeguard the nation's numbering resources. The *Fourth Report and Order* would require interconnected Voice over Internet Protocol (VoIP) providers seeking direct access to numbers to comply with new national security-focused certifications, including those aimed at protecting U.S. networks from the threat posed by equipment and services identified on the FCC's Covered List. The *Fourth Report and Order* would also adopt measures to increase transparency and further streamline the Wireline Competition Bureau's management of the direct access authorization process. The *Fourth Further Notice of Proposed Rulemaking* (*Fourth Further Notice*) would seek comment on additional proposals to strengthen our direct access rules with important robocalling and national security-focused certifications and disclosures, as well as administrative proposals to clarify the Wireline Competition Bureau's application review and oversight authority to improve transparency and ensure that all VoIP numbering authorizations continue to serve the public interest.

What the Report and Order Would Do:

- Require direct access applicants and authorization holders to:
    - Certify that they are not entities identified on the Covered List or an affiliate or subsidiary of such an entity, or provide a detailed explanation describing their relationship to the relevant Covered List entry;
    - Certify that they do not use any "covered" communications equipment and/or services in their networks, or provide a detailed explanation describing their use of "covered" equipment or services;
    - Certify that they are not, and have not been, subject to the denial or revocation of an international and/or domestic section 214 authorization based on national security or law enforcement grounds, and that they are not affiliates or subsidiaries of such entities.
- Require applicants to submit with their filing a list of U.S. states where they initially intend to request numbering resources.

What the Further Notice of Proposed Rulemaking Would Do:

- Propose to adopt a presumption that any applicant for a VoIP numbering authorization that certifies either that it is an entity identified on the Covered List, or that its network uses "covered" equipment and/or services, is not qualified to hold a VoIP numbering authorization;
- Seek comment on measures to protect U.S. telecommunications networks against foreign adversaries, foreign-adversary controlled equipment and/or services, and other cybersecurity and physical-security risks;

[*] This document is being released as part of a "permit-but-disclose" proceeding. Any presentations or views on the subject expressed to the Commission or its staff, including by email, must be filed in WC Docket Nos. 13-97, 07-243, and 20-67, which may be accessed via the Electronic Comment Filing System (https://www.fcc.gov/ecfs). Before filing, participants should familiarize themselves with the Commission's *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. *See* 47 CFR § 1.1200 *et seq*.

- Seek comment on new transparency-focused requirements and disclosures, including physical address disclosure, corporate ownership history disclosure, and disclosure of affiliate wholesale customers; and
- Seek comment on imposing recertification and/or renewal requirements for authorizations.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
Telephone Number Requirements for IP-Enabled Service Providers	)	WC Docket No. 07-243
	)	
	)	
Implementation of TRACED Act Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources	)	WC Docket No. 20-67
	)	

FOURTH REPORT AND ORDER AND FOURTH FURTHER NOTICE OF PROPOSED RULEMAKING*

Adopted: [] **Released: []**

Comment Date: [MM DD, YYYY]
Reply Comment Date: [MM DD, YYYY]

By the Commission:

TABLE OF CONTENTS

I. INTRODUCTION 1
II. BACKGROUND 4
III. DISCUSSION 6
A. Ensuring that all Numbering Authorizations Continue to Serve the Public Interest and Protect National Security 7
1. Covered List-Related Certifications 9
2. Certification that an Applicant is Not Subject to a Denial or Revocation of a Section 214 Authorization 13
B. Application Review and Authorization Oversight 16
1. Codifying State List Requirement for New Applicants 17
2. Authorization Oversight 20
C. Other Issues 24
D. Costs and Benefits 29
E. Legal Authority 30
IV. FURTHER NOTICE OF PROPOSED RULEMAKING 32
A. Presumptive Disqualifying Conditions 33

* This document has been circulated for tentative consideration by the Commission at its November 2026 open meeting. The issues referenced in this document and the Commission's ultimate resolutions of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public's ability to understand the nature and scope of issues under consideration, the public interest would be served by making this document publicly available. The Commission's *ex parte* rules apply and presentations are subject to "permit-but-disclose" *ex parte* rules. *See, e.g.*, 47 CFR §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. *See* 47 CFR §§ 1.1200(a), 1.1203.

B. Security Measures 43
C. Updating Requirements for Applicants and Authorization Holders 51
D. Application Review and Authorization Oversight 62
V. PROCEDURAL MATTERS 65
VI. ORDERING CLAUSES 78
APPENDIX A—FINAL RULES
APPENDIX B—PROPOSED RULES
APPENDIX C—FINAL REGULATORY FLEXIBILITY ANALYSIS
APPENDIX D—INITIAL REGULATORY FLEXIBILITY ANALYSIS

I. INTRODUCTION

1. Protecting national security interests remains a top priority for the Federal Communications Commission (Commission).[1] While advances in communications technology have led to great benefits for consumers and a rich competitive marketplace, the proliferation of call-originating entities, along with the differing regulatory frameworks applied to legacy and IP-based providers, has introduced new challenges in the Commission's efforts to secure the country's voice network from bad actors, both domestic and foreign.[2] The Commission has worked diligently to protect consumers and strengthen the nation's communications infrastructure, while encouraging innovation and the transition to modern IP-based networks.[3]

2. First established in 2015, the Commission's direct access rules permit interconnected Voice over Internet Protocol (VoIP) providers to obtain numbering resources directly from the North American Numbering Plan Administrator (NANPA).[4] Recognizing that the direct access application

[1] *See Public Safety and Homeland Security Bureau and Office of Engineering and Technology Prohibit the Importation and Marketing of Previously Authorized Covered Communications Equipment Added to the Covered List in 2024 or Earlier*, Public Notice, DA 26-635, 2026 WL 1907532, at *2 (PSHSB June 26, 2026).

[2] *Numbering Policies for Modern Communications et al.*, WC Docket Nos. 13-97 et al., Third Report and Order and Third Further Notice of Proposed Rulemaking, 40 FCC Rcd 10481, 10483, para. 5 (2025) (*Third VoIP Direct Access Order and Further Notice*); *see also Combatting Illegal Robocalls Through FCC Numbering Policies, et al.*, Notice of Proposed Rulemaking, FCC 26-17, 2026 WL 1016811, at *7 (WCB Mar. 27, 2026) (*2026 Numbering NPRM*).

[3] Over the last several years, the Commission has protected consumers from illegally spoofed robocalls by strengthening and expanding the STIR/SHAKEN caller ID authentication framework, expanding robocall mitigation requirements, and taking major enforcement action against bad actors, including removal from the Robocall Mitigation Database (RMD). *See, e.g.*, *Call Authentication Trust Anchor*, WC Docket No. 17-97, Eighth Report and Order, 39 FCC Rcd 12894, 12923, para. 2 (2024) (*Caller ID Authentication Eighth Report and Order*); Robocall Mitigation Database Filers, EB-TCD-25-00038590, Order, DA-26-282, 2026 WL 1013555 (EB Mar. 24, 2026) (directing 35 non-compliant voice service providers to cure deficiencies in their filings or explain why they should not face removal from the RMD); Robocall Mitigation Database Filers, EB-TCD-24-00036891, Order, 40 FCC Rcd 5835 (2025) (removing 185 non-compliance voice service providers from the RMD); Robocall Mitigation Database Filers, EB-TCD-25-00038590, Order, 40 FCC Rcd 6009 (2025) (removing an additional 1,203 non-compliant voice service providers from the RMD); *Sumco Panama SA et al.*, EB-TCD-21-00031913, Forfeiture Order, 38 FCC Rcd 7235 (2023) (levying an historic fine of almost $300 million against a variety of entities which placed over five billion illegal auto warranty robocalls to consumers between January 2021 and March 2021). The Commission has also continued encouraging the accelerated transition of communication networks to all-IP technology. *See Advancing IP Interconnection et al*., WC Docket Nos. 25-304 et al., Notice of Proposed Rulemaking, 40 FCC Rcd 8566 (2025); *Wireline Competition Bureau to Host a Workshop on IP Transition Proceedings on July 15 and July 16, 2026*, Public Notice, DA-26-428, 2026 WL 1284574 (WCB Apr. 30, 2026) (announcing a 2-day industry workshop to discuss issues, timelines, and best practices for transitioning to an all-IP network).

[4] 47 CFR § 52.15(g)(2); *see also Numbering Policies for Modern Communications et al.*, WC Docket Nos. 13-97 et al., Report and Order, 30 FCC Rcd 6839, 6848-51, paras. 21-24 (2015), *appeal dismissed*, *NARUC v. FCC*, 851 F.3d

process is "the first line of defense" in protecting scarce numbering resources,[5] the Commission updated its VoIP numbering authorization rules in 2023 and 2025, establishing a uniform framework where all authorization holders are required to make robocall-related, public safety, and national security certifications and information disclosures.[6]

3. Today, we adopt this *Fourth Report and Order* and *Fourth Further Notice of Proposed Rulemaking* as an important next step in furthering the Commission's efforts to protect national security interests and to secure the nation's numbering resources against bad actors. In the *Fourth Report and Order*, we require that new applicants and existing authorization holders for the Commission's VoIP numbering authorization comply with new national security-focused certifications aimed at protecting numbering resources from entities identified on the Commission's Covered List. We also adopt measures to increase transparency and further streamline the review and management of the authorization process by the Wireline Competition Bureau (Wireline Bureau or Bureau). In the *Fourth Further Notice of Proposed Rulemaking*, we seek comment on additional proposals to strengthen our direct access rules with important robocalling and national security-focused certifications and disclosures, as well as administrative proposals to clarify the Bureau's application review and oversight authority to improve transparency and ensure that all VoIP numbering authorizations continue to serve the public interest.

II. BACKGROUND

4. In the years after the *First Report and Order* established the VoIP numbering authorization in Part 52 of our rules,[7] Bureau staff have reviewed scores of direct access applications,[8] and, based on lessons learned, identified gaps in the application process that could potentially be exploited by bad actors.[9] The Commission considered ways to update the application requirements for the VoIP numbering authorization to better safeguard numbering resources and enhance the Bureau's public interest review.[10] After adopting a *Further Notice of Proposed Rulemaking* (*First Notice*) in 2021,[11] the Commission adopted a *Second Report and Order* in 2023 to strategically update the

1324 (D.C. Cir. 2017) (*First VoIP Direct Access Order*) (adopting the original direct access rules for interconnected VoIP providers). While the Numbering Administrator functions are described separately in our rules, *see, e.g.*, 47 CFR §§ 52.13 (number resource administration duties), 52.20 (number pooling), they are currently combined under a single Commission contract. *See* Press Release, FCC, FCC Selects SomosGov as Next Telephone Number Administrator and Reassigned Numbers Database Administrator (Dec. 21, 2020), https://docs.fcc.gov/public/attachments/DOC-368493A1.pdf.

[5] *Numbering Policies for Modern Communications et al*., WC Docket No. 13-97 et al., Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 8951, 8957, para. 11 (2023) (*Second VoIP Direct Access Order and Further Notice*); *see also 2026 Numbering NPRM* at *1, para 1.

[6] *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd 8957-81, paras. 11-58; *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-93, paras. 10-22.

[7] The Commission originally established the VoIP numbering authorization process under section 52.15(g)(3) of our rules. *See First VoIP Direct Access Order*, 30 FCC Rcd at 6889, Appx. B. By this *Fourth VoIP Direct Access Order*, we reorganize the direct access rules to move the VoIP numbering authorization to section 52.18. *See* infra Appx. A. References to our direct access rules in this *Report and Order* follow the revised numbering provided in Appendix A.

[8] We refer to "direct access" and "VoIP numbering authorization" interchangeably throughout this item.

[9] *See Numbering Policies for Modern Communications et al.*, WC Docket Nos. 13-97 et al., Further Notice of Proposed Rulemaking, 36 FCC Rcd 12907, 12912-13, paras. 10-11 (2021) (*First VoIP Direct Access Further Notice*).

[10] *Id.* at 12913-26, paras. 13-39.

[11] *Id.* at 12929, para. 50. The Commission sought comment on how to improve the interconnected VoIP direct access application process to address the identified gaps in the direct access application process, namely, illegal

requirements for new applicants to the VoIP numbering authorization, further protecting the nation's finite numbering resources from both foreign and domestic threats.[12] Specifically, the Commission updated the VoIP numbering authorization process with certifications related to robocall mitigation, public safety, and national security, and required greater disclosure of ownership interests.[13]

5. Accompanying the *Second Report and Order*, the Commission also adopted a *Second Further Notice of Proposed Rulemaking* (*Second Further Notice*), seeking comment on the duties of existing direct access authorization holders whose authorizations predated the new application requirements adopted in the *Second Report and Order*.[14] Specifically, in the *Second Further Notice* the Commission proposed to require existing interconnected VoIP direct access authorization holders to also provide the updated certifications, acknowledgments, and disclosures adopted in the *Second Report and Order* for new applicants.[15] We applied these updated requirements to existing authorization holders in the 2025 *Third Report and Order*.[16] Accompanying the *Third Report and Order*, the Commission also adopted a *Third Further Notice of Proposed Rulemaking* (*Third Further Notice*), seeking comment on whether we should restrict direct access applications or reevaluate existing authorizations for entities that are identified on the Commission's Covered List or that have "covered" equipment in their networks.[17]

III. DISCUSSION

6. Today, we adopt rules that further the Commission's efforts to safeguard U.S. numbering resources by strengthening the direct access rules that govern VoIP numbering authorizations. These measures bolster protections for numbering resources against entities that pose an unacceptable national security risk. As bad actors seek new and creative methods for exploiting the nation's communications infrastructure, the Commission is acting through this rulemaking to implement new, strategic measures to safeguard our finite numbering resources and protect American consumers.

A. Ensuring that all Numbering Authorizations Continue to Serve the Public Interest and Protect National Security

7. As we have often noted, "it is obvious and unarguable that no governmental interest is

robocalling, national security, and number resource exhaust. *Id.* at 12913, para. 11. The Commission received comments from a wide range of stakeholders. *See* WC Docket No. 13-97 (receiving comments from various organizations and entities, including state public utility commissions, interconnected VoIP providers, industry standards groups and trade associations, and consumer advocates).

[12] *See Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8953, 8998-99, paras. 3, 105-107.

[13] *Id*. at 8957-74, paras. 12-44.

[14] *Id*. at 8991-95, paras. 79-92. Additionally, the *Second Further Notice* sought comment on a proposal to minimize harms that may arise from bad actors that access numbering resources indirectly by holding their direct access authorization holder "partners" accountable for their actions. *See id*. at 8993-95, paras. 86-92. This matter raised in the *Second Further Notice* was not addressed in the *Third Report and Order*, and we do not address it here in this *Fourth Report and Order*, but it will remain pending.

[15] *Id.* at 8992, para. 81. We further proposed to use the new information to determine whether a revocation of authorization, inability to obtain additional numbers, reclamation of unassigned numbers, or enforcement action may be warranted, just as if the information had been provided as part of a new application or an update or correction to their original application. *See id*. at 8992, para. 82. We also proposed a deadline to file the updated information for existing authorization holders within 30 days after the effective date of an order adopting such a rule change. *See id*. at 8992, paras. 81, 83.

[16] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-93, paras. 10-22.

[17] *Id*. at 10495-96, paras. 30-31. In the *Third Further Notice*, we also refreshed the record on reclaiming numbering resources as a result of a VoIP numbering authorization revocation. *Id.* We do not address this matter raised in the *Third Further Notice* in this *Fourth Report and Order*, but it will remain pending.

more compelling than the security of the Nation."[18] In furtherance of this interest, Congress has charged the Commission with a number of important initiatives to safeguard our national security. Section 1 of the Communications Act of 1934 as amended (the Act), established the Commission "for the purpose of national defense," among other purposes.[19] The Secure and Trusted Communications Networks Act of 2019 (Secure Networks Act) requires the Commission to publish and maintain a list of communications equipment and services (the Covered List) that pose "an unacceptable risk to the national security of the United States or the security and safety of United States persons[.]"[20] Building on the Secure Networks Act, the Secure Equipment Act of 2021 directs the Commission to prohibit equipment authorizations for any equipment identified on the Commission's Covered List ("covered" equipment).[21]

8. In order to further advance these important goals, as well as to protect our numbering resources from exploitation by bad actors,[22] we revise our direct access rules[23] to include new certification requirements that align the direct access rules with the broader cross-agency efforts to protect national security interests and address the persistent threat from foreign adversary entities, equipment, and services.[24] Additionally, we adopt a certification requirement for both new applicants and existing

[18] *See, e.g.*, *Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program*, ET Docket No. 21-232, Second Report and Order and Second Further Notice of Proposed Rulemaking, 40 FCC Rcd 8430, 8453-54, para. 45 (2025) (*Second Equipment Authorization Order*) (quoting *Haig v. Agee*, 453 U.S. 280, 307 (1981)).

[19] 47 U.S.C. § 151.

[20] Secure and Trusted Networks Act of 2019, Pub. L. No. 116-124, § 2(b)-(c), 134 Stat. 158 (2020) (codified at 47 U.S.C. § 1601 *et seq.*) (*Secure Networks Act*); 47 CFR §§ 1.50002, 1.50003. The Public Safety and Homeland Security Bureau, on delegated authority from the Commission, publishes and maintains the Commission's Covered List. 47 CFR § 1.50002. For the current version of the Covered List, *see* FCC, *List of Equipment and Services Covered By Section 2 of The Secure Networks Act,* https://www.fcc.gov/supplychain/coveredlist (last updated Sept. 17, 2026).

[21] Secure Equipment Act of 2021, Pub. L. No. 117-55, 135 Stat. 423 (2021) (codified at 47 U.S.C. § 1601) (*Secure Equipment Act*); 47 CFR § 2.903. Pursuant to the Secure Networks Act, the Commission publishes the Covered List, a list of equipment and services that have been specifically determined by enumerated sources to pose an unacceptable risk to the national security of the United States or the security and safety of United States persons. *Id.* Beginning in December 2025, the Commission's Public Safety and Homeland Security Bureau (PSHSB)—following specific determinations pursuant to the Secure Networks Act—updated the Covered List several times to identify categories of equipment produced in a foreign country. These updates were the first instances of covered equipment and services being defined according to the production location of a class or sector of products and services, rather than in terms of a specific entity. *See Public Safety and Homeland Security Bureau Announces Conditional Approval and Exemption of Certain Uncrewed Aircraft Systems and Routers from FCC Covered List*, Public Notice, DA 26-875, 2026 WL 2517267, at *1-2 (PSHSB Aug. 21, 2026). The certification requirements we adopt in § 52.18(b)(14) apply only to those equipment and services produced or provided by specific entities identified on the Covered List, rather than equipment or services identified based on the production location.

[22] *See* 47 U.S.C. § 251(e)(1).

[23] *See infra* Appx. A, 47 CFR § 52.18(b).

[24] *See Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program*, ET Docket No. 24-136, Report and Order and Further Notice of Proposed Rulemaking, 40 FCC Rcd 3616, 3617-19, paras. 2-3 (2025) (*TCB and Measurement Facilities Report and Order and FNPRM*) (prohibited FCC recognition of any telecommunication certification body (TCB), measurement facility (test lab), or laboratory accreditation body that is identified on the Covered List or owned by, controlled by, or subject to the direction of a foreign adversary); *Protecting Against National Security Threats in Domestic Telecommunications Service*, WC Docket No. 26-82, Notice of Proposed Rulemaking, FCC 26-29, 2026 WL 1284770, at *6-12 (2026) (*Blanket Domestic 214 NPRM*) (proposing to exclude entities identified on the Covered List, and current and future affiliates, and subsidiaries, from being authorized to provide interstate

authorization holders that they are not, and have not been, subject to a denial or revocation of an international and/or domestic section 214 authorization based on national security or law enforcement grounds. These updates demonstrate the Commission's continued commitment to strengthening our direct access rules to target key national security interests and ensure that consumers are protected from bad actors operating at home and abroad.

1. Covered List-Related Certifications

9. We revise our rules to require certification from both new interconnected VoIP direct access applicants and existing direct access authorization holders that they are not (1) entities identified on the Covered List (i.e., named entities and their current and future affiliates and subsidiaries and any entity included by reference therein).[25] We also require certification from both new applicants and existing authorization holders that their interconnected VoIP networks do not use any "covered" communications equipment and/or service, as defined in 47 U.S.C. § 1608(5), that are based on producer/provider-based determinations, reflected in the Covered List at the time of the application submission or submission by an existing authorization holder.[26] As we explained in the *Evolving Risks Further Notice*, narrowing our requirements to focus on the use of "covered" equipment or services that are based on producer/provider-based determinations "tracks modifications to how the Covered List has evolved over the pendency of this proceeding, while providing regularity clarity."[27] Providers that cannot

telecommunications service pursuant to blanket section 214 authority and proposing to revoke existing blanket 214 authority of those entities).

[25] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10495-96, para. 30. For purposes of this rule, we use the definitions of "affiliate" and "subsidiary" in 47 CFR § 2.903(e), consistent with the Commission's definition of these terms in its rules administering the Covered List and in similar contexts. *See* 47 CFR § 2.903(e) (defining the term "affiliate" as "an entity that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another entity; for purposes of this definition, the term 'own' means to have, possess, or otherwise control an equity interest (or the equivalent thereof) of 10 percent or more," and defining the term "subsidiary" as "any entity in which another entity directly or indirectly: (i) Holds de facto control; or (ii) Owns or controls more than 50 percent of the outstanding voting stock"). *See Review of Submarine Cable Landing License Rules and Procedures to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 Through 1.1109 of the Commission's Rules*, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 26-42, 2026 WL 1920490, at *19, para. 41 & n.198 (*Second Submarine Cable Order*) (reaffirming the 47 CFR § 2.903(e) definitions of "affiliate" and "subsidiary"); *Review of Submarine Cable Landing License Rules and Procedures to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks*; *Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules*, OI Docket No. 24-523, MD Docket No. 24-524, Report and Order and Further Notice of Proposed Rulemaking, 40 FCC Rcd 6481, 6498, para. 31 & n.84 (2025) (*First Submarine Cable Order*) (adopting the 47 CFR § 2.903(e) definitions of "affiliate" and "subsidiary"); *Blanket Domestic 214 NPRM* at *4, para. 6, n.23 (citing *Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program*, ET Docket Nos. 21-232, 21-233, Report and Order, Order, and Further Notice of Proposed Rulemaking, 37 FCC Rcd 13493, 13565, para. 183 (2022) (*First Equipment Authorization Order*) ("We note that the definition of affiliate in the Communications Act further states that '[f]or purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent,' and we adopt such further clarification here."). *See also Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10496, 10500, para. 31, Appx. A (establishing obligations for existing authorization holders to submit updated certification and information disclosure requirements in order to maintain their authorization); *see also* 47 CFR § 52.18(j)(6) (requiring existing authorization holders to submit the updated requirements).

[26] *See infra* Appx. A, 47 CFR § 52.18(b)(14), (j)(6).

[27] *Review of International Section 214 Authorizations to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks; Amendment of the Schedule of Application Fees Set Forth in Sections 1.1102 through 1.1109 of the Commission's Rules*, IB Docket No. 23-119, MD Docket No. 23-134, Report and Order

certify to meeting these conditions must instead provide with their filing a detailed explanation describing their relationship to the relevant Covered List entry and/or use of "covered" equipment or services and any proposed mitigation or remediation measures. We direct the Bureau to review each submission individually, in accordance with the current process for reviewing direct access filings, and in coordination with the Public Safety and Homeland Security Bureau, to ensure that the application or authorization serves the public interest.[28] And, in the *Further Notice of Proposed Rulemaking* below, we seek comment on further procedural steps to enhance the Bureau's evaluation of these Covered List-related certifications.[29]

10. The Covered List and "covered" equipment and/or services certifications we adopt today not only strengthen our direct access rules, but also bring the VoIP numbering authorization process into step with broader government action in protecting communication networks from entities, equipment, and services that pose an unacceptable national security risk. The U.S. government has accelerated efforts to safeguard communications infrastructure, and the Commission has prioritized identifying and eliminating security risks within the nation's networks.[30] Ensuring that all authorizations and licenses serve the public interest and protect consumers from potential bad actors remains a top priority at the Commission.[31] The national security-focused certifications we adopt in this *Fourth Report and Order* are another important step to establishing a unified defense against foreign threats.

11. We sought comment in the *Third Further Notice* on whether we should restrict access to VoIP numbering authorizations for entities identified on the Covered List, or for entities with "covered" equipment and/or services in their networks.[32] The record reflects no significant opposition to the national security certification requirements we adopt today for new applicants and existing authorization holders.[33] VON, one of the only commenters to address these proposals, asserts without explanation that "[t]here is no benefit to restricting new VoIP numbering authorizations or reevaluating existing [authorizations] for entities that may be identified on the Covered List or using equipment on the FCC

---

and Further Notice of Proposed Rulemaking, FCC-CIRC 2610-05, at 64-65, paras. 89-90 (Oct. 8, 2026) (*2026 Evolving Risk Order and Further Notice*) (adopting "a modified and narrower version" of the measure "by prohibiting the use and/or addition of covered equipment or services that are based on producer/provider-based determinations").

[28] *See, e.g.*, *infra* Appx. A, 47 CFR § 52.18(g)(4) (permitting the rejection of an application if "[g]ranting the application would not serve the public interest"); 47 CFR § 52.18(i)(4) (permitting the revocation or termination of a VoIP numbering authorization if doing so "is in the public interest").

[29] *See infra* Part IV.

[30] *First Equipment Authorization Order*, 37 FCC Rcd at 13497, para. 6.

[31] *See Blanket Domestic 214 NPRM*, at *1; *First Submarine Cable Order*, at 40 FCC Rcd at 6483-86, paras. 1-10 (updating the Commission's submarine cable licensing process to protect critical U.S. communications infrastructure against foreign adversary threats by adopting reporting and certification requirements, routine conditions, and a presumption that an entity identified on the Covered List or "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary," as defined in section 1.70001(g), is not qualified to hold a cable landing license unless the applicant overcomes the adverse presumption).

[32] *Third VoIP Direct Access Further Notice*, 40 FCC Rcd at 10495-96, paras. 30-31. In the *Third Further Notice*, we also sought comment on whether the Commission should consider prohibiting providers with a VoIP numbering authorization from providing service to entities with "covered" equipment in their networks in order to avoid entities with "covered" equipment gaining indirect access to numbering resources through resale or other arrangements. *Id.* at 10496, para. 31. We do not address this matter raised in the *Third Further Notice* in this *Fourth Report and Order*, but it will remain pending.

[33] ATIS Comments at 6 (2026); VON Comments at 3 (2026).

'Covered List.'"[34] We disagree. As we explained in the *Third Further Notice*, communications equipment and services on the Covered List have already been determined to pose unacceptable risks to the national security of the United States and its citizens.[35] Access to U.S. numbering resources is a vital component of the provision of communications service. The ability to deny new applications and to revoke existing authorizations that raise national security concerns is an important aspect of managing the authorization process and protecting numbering resources and communications networks from bad actors. The certification requirements we adopt today provide information that will support more comprehensive review of applications and authorizations and, when warranted, facilitate enforcement of our rules.

12. Furthermore, the certifications we adopt today should not be overly burdensome for entities to comply with given that they are straightforward attestations. New applicants need only add the additional certifications to their application in order to satisfy the requirements we adopt today. For existing authorization holders, a post-grant filing will be required.[36] While we acknowledge that this presents some additional burden to existing authorization holders, we find it to be minimal, particularly in comparison to the expected benefits of these disclosures. As discussed above, the certifications we adopt today are consistent with broader Commission initiatives, and with the determination that entities, equipment, and services on the Covered List pose unacceptable risks to national security.[37] Grantees are required to maintain the accuracy of their filing, pursuant to our rules, including updated certifications and information disclosures when such information should be corrected or new, material information should be reported.[38] This includes the certifications we adopt today. We previously deemed this ongoing requirement to be minimally burdensome for authorization holders, particularly in context of the important public interest of ensuring that all filings contain current and accurate information in order for Commission staff to continually assess the fitness of entities to maintain their VoIP numbering authorization.[39] We have taken steps to streamline the filing process for existing authorization holders to submit updated certifications and information disclosures in an administrative docket and an inbox for confidential filings, DAA@fcc.gov.[40] The Commission has established filing procedures for confidential filings,[41] and the Bureau accepts confidential and sensitive business information for VoIP numbering authorization filings via DAA@fcc.gov.[42]

2. Certification that an Applicant is Not Subject to a Denial or Revocation of a Section 214 Authorization

13. We also revise our direct access rules to require both new VoIP direct access applicants

[34] VON Comments at 3 (2025). Although ATIS also mentions these proposals, it states that it "generally does not address such issues" and merely suggests that "there are processes in place if the Commission chooses to pursue reclamations in such circumstances." ATIS Comments at 6. To the extent that ATIS argues that the rules we adopt today are not necessary as a result, we disagree, for the reasons stated above.

[35] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10495-96, para. 30.

[36] *See infra* Appx. A, 47 CFR § 52.18(j)(6) (requiring authorization holders to file updated requirements).

[37] *See supra* note 26.

[38] *See infra* Appx. A, 47 CFR § 52.18(j)(1), (5).

[39] *See Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-93, paras. 10-23.

[40] FCC, ECFS, INBOX-52.18 (j), https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%22INBOX-52.15%20%20(X)%22)) (last visited Sept. 14, 2026); *see also Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-87, para. 11. Currently, authorization holders submit updates to their filing to INBOX-52.15 (x). Once the rule reorganization we adopt here becomes effective, authorization holders will submit updates to INBOX-52.18 (j).

[41] *See* 47 CFR § 0.459.

[42] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-87, para. 11.

and existing authorization holders to certify that they are not and have not been subject to the denial or revocation of an international and/or domestic section 214 authorization based on national security or law enforcement grounds.[43] Section 214(a) of the Act, requires carriers to obtain from the Commission a certificate of present or future public convenience and necessity before undertaking the construction of a new interstate line, acquiring, or operating any interstate line, or engaging in transmission over such an interstate line.[44] The Commission has granted "blanket" entry certification to all domestic carriers seeking to construct, operate, or engage in transmission over domestic lines of communication.[45] However, under section 63.18 of the Commission's rules, any person or entity that seeks to provide U.S.-international common carrier service must obtain prior Commission approval pursuant to section 214 of the Act by filing an International Section 214 Application with the Commission that contains the required information.[46] The requirements we adopt today will account for those interconnected VoIP providers that are applying for, or have obtained, direct access to numbers, and may separately provide telecommunications services and are therefore subject to section 214 of the Act with respect to the provision of those services.

14. This section 214-related certification will require VoIP direct access applicants and existing authorization holders to certify with the Commission that they are not and have not been subject to a denial or revocation of a section 214 authorization based on national security or law enforcement grounds.[47] Providers should also certify that they are not affiliates or subsidiaries of entitites that are subject to a denial or revocation of a section 214 authorization based on national security or law enforcement grounds. It stands to reason, and is consistent with the Commission's public interest responsibility to protect networks against foreign threats, that if a section 214 application is denied on national security grounds or if an existing section 214 authorization is deemed to no longer serve the public interest and is revoked on national security or law enforcement grounds, then a VoIP numbering authorization should also be revoked, or the application denied, given the broader national security concerns at stake.

15. The record reflects no opposition to the proposal.[48] We anticipate that making the certification itself will be minimally burdensome on applicants and authorization holders, as a straightforward attestation. Denying new applications or revoking an existing VoIP numbering authorization may be burdensome for the impacted entity, but we believe that the benefit of protecting numbering resources, communications networks, and consumers from bad actors greatly outweighs this concern. Parity between the authorizations in these circumstances will create consistent expectations for providers and re-enforce our broader goal of protecting consumers from entities seeking to exploit

[43] *Id.* at 10495-46, para. 30; Appx. A, 47 CFR § 52.18(b)(16), (j)(6).

[44] *See* 47 U.S.C. § 214(a).

[45] 47 CFR § 63.01(a). Section 63.01 of the Commission's rules provides that "any party that would be a domestic interstate communications common carrier is authorized to provide domestic, interstate services to any domestic point and to construct or operate any domestic transmission line as long as it obtains all necessary authorizations from the Commission for use of radio frequencies." *Id*.

[46] 47 CFR § 63.18.

[47] *See Blanket Domestic 214 NPRM*, at *7, paras. 11-12 (citing *Protecting our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, GN Docket No. 25-166, Report and Order, FCC 26-2, at *52-53, paras. 88-89 (2026) (*Foreign Adversary Control Report and Order*), and seeking comment on procedural steps for revocation and explaining that the *Foreign Adversary Control Report and Order* adopted a streamlined revocation procedure consisting of three steps: (1) Notice of Deficiency and Opportunity to Respond (except in the case of willfulness or those in which public health, interest, or safety requires otherwise, in which case we may proceed directly to step two); (2) Order to Show Cause; and (3) Order of Revocation)).

[48] ATIS Comments at 6 (2025) (noting that "there are processess in place if the Commission chooses to pursue reclamation in such circumstances").

numbering resources and harm our national security interests.

B. Application Review and Authorization Oversight

16. We also adopt measures to increase transparency during the review of direct access filings and to further streamline the review and management of the VoIP numbering authorization process. Additionally, we clarify the Bureau's delegated authority to suspend or deny numbering resource requests by authorization holders in cases that warrant additional investigation or require a referral for national security review.

1. Codifying State List Requirement for New Applicants

17. As proposed in the *Second Further Notice*, we require new direct access applicants to provide in their applications for a VoIP numbering authorization a list of states where they initially intend to request numbering resources.[49] This update formalizes the existing practice by Bureau staff in requesting this information during the direct access application review process.[50] While the authorization itself is nationwide in scope, numbering requests are handled on a state-by-state basis and most applicants target specific states where they will be providing service and requesting numbers.[51] It is helpful to the state commissions to anticipate numbering requests, ensure that requesting entities are compliant with state-level requirements, and for the overall stewardship of the nation's numbering resources.

18. The record reflects broad support for inclusion of a state list with direct access applications.[52] In supporting the proposal, the Alliance for Telecommunications Industry Solutions (ATIS) noted that "[s]uch a requirement would promote fairness by ensuring parity with other providers that are required to provide such information when obtaining similar authorizations from state commissions."[53] ATIS further noted that "[t]his requirement would also help better prepare state commissions to address interconnected VoIP provider applications while the applications are pending at the Commission. The proposed requirement would give the states and the NANPA more awareness of new entrants and how those new entrants' numbering requests may impact demand and potentially accelerate the need for area code relief planning and implementation."[54] The Maine Public Utilities Commission commented that "[i]t is extremely useful to understand in which states [applicants] intend to operate when seeking approval from the Commission."[55] We agree.

19. We also agree with ATIS, which argues that this requirement "would not impose any undue burden on applicants."[56] Identifying the state or states where an entity will initially provide service and eventually request numbering resources is a standard business decision for an entity applying to access numbering resources. While the state(s) of service may change, we note that the requirement is for state(s) of *initial* service only, which removes the burden of repeated updates any time that a new state is

[49] *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8993, para. 86.

[50] *See First VoIP Direct Access Order*, 30 FCC Rcd at 6850 & n.74 ("Although we establish a process to grant interconnected VoIP providers a blanket authorization to allow them to request numbers anywhere in the country, we strongly encourage applicants to submit a list of the state in which they intend to request numbers as an attachment to their authorization applications.").

[51] *See infra* Appx. A, 47 CFR § 52.18(b)(7) (requiring applicants to acknowledge they must file requests for numbers with the relevant state commission(s) at least 30 days before the request to the numbering administrator).

[52] ATIS Reply Comments at 5 (2023); NASUCA Reply Comments at 8 (2023); Maine Public Utilities Commission Reply Comments at 3 (2023).

[53] ATIS Reply Comments at 5 (2023).

[54] *Id.*

[55] Maine Public Utilities Commission Reply Comments at 3 (2023).

[56] ATIS Reply Comments at 5 (2023).

added or removed from the service list. Finally, under existing Bureau procedures, all applicants are already asked to provide a state list with their applications, and most do so unprompted. Codifying this existing practice will offer greater clarity for applicants as to the materials required to support their application. Therefore, we find that any minimal burden on applicants stemming from this rule change will be outweighed by the benefits of increased transparency.

2. Authorization Oversight

20. In the *Second Report and Order*, the Commission adopted rules delegating authority to the Wireline and Enforcement Bureaus to direct the NANPA to suspend an authorization holder's access to new numbering resources after either bureau determines that the authorization holder acted willfully, or public health, interest, or safety requires an immediate suspension, or after giving the authorization holder notice and an opportunity to demonstrate or achieve compliance with our rules.[57] In the *Second Further Notice*, the Commission proposed extending the suspension of numbering requests when existing authorization holders submit the new certifications and information disclosures if such information presents a material change or when additional investigation is necessary to confirm that the authorization continues to serve the public interest.[58] In order to avoid disruption of service to customers during our review of the updated or corrected information, the *Second Further Notice* also proposed to permit authorization holders to continue to use numbers they obtained previously pending the outcome of the Bureau's investigation.[59] We adopted this proposal in the *Third Report and Order*.[60]

21. Today, we clarify the Commission's delegation of authority to the Wireline and Enforcement Bureaus to direct the NANPA to suspend an authorization holder's access to new numbering resources. In the *Third Report and Order*, we noted that ATIS supported denying new numbering requests, as opposed to suspension, but only in instances of material risk to national security or if it is likely to perpetuate the origination of illegal robocalling.[61] We "disagree[d] and reaffirm[ed] that the Wireline and Enforcement Bureaus have delegated authority to suspend an authorization holder's access to new numbering resources in certain circumstances pending an investigation and following required procedures,"[62] noting that, "[w]hile in the course of considering suspension, we should take into account specific concerns about national security or unlawful robocalling, but willful violations of Commission rules or other concerns to public health, interest or safety will also be evaluated and may warrant a suspension of VoIP numbering authorization."[63] We do not disturb that finding today. In rejecting ATIS's suggested limited scope, however, we did not decide on the procedural aspects of the NANPA's handling of a numbering authorization suspension.[64]

---

[57] *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8984-85, para. 65; *infra* Appx. A, 47 CFR § 52.18(h)(1).

[58] *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8992, para. 84.

[59] *Id*. at 8992-93, para. 85.

[60] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492, para. 21.

[61] *Id*. at 10492-93, para. 22.

[62] *Id.* As the Commission explained, suspension of a direct access authorization holder's access to new numbering resources must comply with the procedural requirements of 5 U.S.C. § 558(c). *See Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8984-85, para. 65; *see also* 5 U.S.C. § 558(c) (requiring notice and an opportunity to demonstrate or achieve compliance when suspending or revoking a license, except in cases of willfulness or when public health, interest, or safety requires otherwise); *infra* Appx. A, 47 CFR § 52.18(h).

[63] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492-93, para. 22.

[64] Suspension and denial have different purposes that impact the administration of numbering resources. Suspension is an interim action that puts the numbering resource request into a temporary hold pending the outcome of the administrative matter. Denial, on the other hand, is a final action that concludes a particular request.

22. In this *Fourth Report and Order*, we change agency procedure and direct the Wireline and Enforcement Bureaus to instruct the NANPA, via public notice, to deny all pending and future requests for numbers if the new information submitted by an authorization holder indicates a material change or discloses new information such that additional investigation is necessary to confirm that the authorization continues to serve the public interest.[65] Similarly, if the new information leads the Commission to refer the authorization holder to the Executive Branch agencies for review of the new or updated information, the Wireline Bureau will direct the NANPA via public notice to deny all pending and future requests for numbers. In either case, the Bureau must comply with the procedural requirements of 5 U.S.C. § 558(c), as specified by our rules,[66] and the directive will remain in effect until the Bureaus' review is complete and final action is taken.

23. We find that this approach will streamline the administrative process, continue to ensure that adequate review is given to information changes so that VoIP numbering authorizations continue to serve the public interest, while also ensuring that finite numbering resources do not remain in states of limbo pending review or investigation. In its comments to the *Second Further Notice*, ATIS noted that it would be more appropriate to "deny" numbering requests in such circumstances as opposed to "suspend" as "[d]enying pending and future number requests for numbers would be less complicated for the NANPA to implement from an operational perspective, as it eliminates the need to track suspended applications for numbering resources."[67] We agree. We believe that this procedural change will be easier to administer, since unlike suspensions, denials do not require ongoing administrative resources to manage. While we recognize that a denial of a numbering request may create some additional burdens for impacted entities, we believe that those burdens will be minimal, and are justified by the need to facilitate efficient processing of numbering resource requests and verify that the authorization continues to serve the public interest.[68]

C. Other Issues

24. *Filing procedures*. We require all new applicants and authorization holders to continue submitting filings to the Electronic Comment Filing System (ECFS).[69] New applicants should file their submissions via the designated administrative docket.[70] Authorization holders should file all post-grant updates and reporting via the designated administrative docket.[71] Applicants and authorization holders should provide courtesy copies via e-mail to DAA@fcc.gov, unless the Bureau specifies another method.[72] We note that the Bureau may request additional methods or filing procedures as necessary.

---

[65] *See* 5 U.S.C. § 553(b)(4) (permitting exception to the notice and comment rulemaking requirement under the Administrative Procedure Act for "interpretative rules, general statements of policy, or rules of agency organization, procedure, or practice").

[66] *See supra* note 62.

[67] ATIS Reply Comments at 4 (2023).

[68] *Id*. For example, while impacted entities will need to re-apply for the numbering resources if and when they are eligible to do so, as ATIS notes, the application process for numbering resources is "fairly easy and straightforward[.]" *Id*. *See also infra* Appx. A, 47 CFR § 52.18(g)(1), (2).

[69] FCC, *Welcome to the FCC's Electronic Comment Filing System*, https://www.fcc.gov/ecfs/search/search-filings (last visited Sept. 17, 2026); *see also Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-87, para. 11; 47 CFR § 52.18(c).

[70] Currently, applicants submit their filing to INBOX-52.15. Once the rule reorganization we adopt here becomes effective, applicants will submit filings to INBOX-52.18.

[71] Currently, authorization holders submit updates to their filing to INBOX-52.15 (x). Once the rule reorganization we adopt here becomes effective, authorization holders will submit updates to INBOX-52.18 (j).

[72] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486-87, para. 11.

25. *Pending Applicants and Existing Authorization Holders*. We also require all filers with pending applications, and all existing authorization holders, as applicable, to comply with the new requirements adopted in this *Fourth Report and Order* within 30 days of the announcement by the Bureau of any required approval by the Office of Management and Budget for any new information collection requirements pertaining to these rules.[73] This is consistent with the standard we adopted in the *Third Report and Order*.[74] It is also consistent with our existing rules requiring authorization holders to maintain the accuracy of their filings and to submit any corrected or updated information within 30 days of the change.[75] This consistent approach will benefit impacted entities, many of whom are already accustomed to this timeframe.

26. *Non-compliance.* We reiterate that holders of all Commission authorizations, including the VoIP numbering authorization, have a duty to operate in the public interest.[76] Where the Commission grants a right or privilege, it unquestionably has the right to revoke or deny that right or privilege in appropriate circumstances.[77] Our direct access rules provide grounds for the revocation and/or termination of VoIP numbering authorizations,[78] and the Commission has delegated authority to both the Wireline and Enforcement Bureaus to direct the NANPA to suspend and/or deny new numbering resource requests by authorization holders in certain circumstances and following required procedures.[79] Those same enforcement mechanisms continue to apply to all VoIP numbering applicants and authorization holders, including with respect to the updated requirements we adopt today.

27. If, upon review, Commission staff determine that an applicant fails to file a completed application or files a certification or disclosure that illustrates that granting the application would be contrary to the public interest or to our rules, the application may be rejected.[80] Similarly, if Commission

[73] *See infra* para. 78. As set forth in section 1.65 of the Commission's rules, an applicant has a responsibility to maintain the continuing accuracy and completeness of information furnished in a pending application. *See* 47 CFR § 1.65. Accordingly, applications that are pending at the time of the effective date of the rules we adopt today will be required to make a supplemental filing of the new requirements in order to complete their applications.

[74] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10486, para. 10.

[75] *See infra* Appx. A, 47 CFR § 52.18(j)(1).

[76] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492, para. 21 (citing *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8969, para. 66); *see also infra* Appx. A, 47 CFR § 52.18(g)(4) (delegating authority to the Bureau to reject an application if it does not serve the public interest).

[77] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492, para. 21. *See also China Unicom (Americas) Operations Ltd. v. FCC*, 124 F.4th 1128, 1143 (9th Cir. 2024) (opining that "the statute's [47 U.S.C. § 214] grant of authority to 'issue' certificates to telecommunications carriers must be understood as carrying with it an implied incidental authority to revoke such documents").

[78] *See infra* Appx. A, 47 CFR § 52.18(i); *see also Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492, para. 21 (citing *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8983-84, paras. 63-64 & n.214) ("The Commission uses the term 'termination' where an authorization is terminated based on the authorization holder's failure to comply with a condition of the authorization, and has determined that the procedures applicable to termination need not mirror the procedures used for revocation of authorizations.").

[79] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492, para. 21 (citing *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8984-85, para. 65).

[80] *See infra* Appx. A, 47 CFR § 52.18(g)(4) (permitting the rejection of an application if "[g]ranting the application would not serve the public interest"); *see also* 47 CFR § 52.18(i)(4) (permitting the revocation or termination of a VoIP numbering authorization if doing so "is in the public interest"); 47 CFR § 1.65(a) (reiterating that "each applicant is responsible for the continuing accuracy and completeness of information furnished in a pending application"); *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8982, para. 62 & n.207 ("By 'reject' we mean either dismiss or deny depending on the specifics of any particular application and the reason for its rejection.").

staff determine that an authorization holder is non-compliant with updated requirements, or if the information submitted is deemed insufficient or raises questions as to whether the authorization still serves the public interest, then the authorization status may be reviewed, leading to possible suspension, termination and/or revocation of the authorization, as necessary.[81]

28. *Reorganization of Direct Access Rules*. In addition to the changes discussed above, in order to improve the clarity of our requirements for stakeholders and regulated entities, in this *Fourth Report and Order* we implement a non-substantive reorganization of our numbering resource access rules. We do so by moving the provisions related to the interconnected VoIP provider numbering authorization to a separate subsection. We believe this administrative change will facilitate easier access to and review of our requirements for numbering resource applications.

D. Costs and Benefits

29. We find the rules we adopt today are likely to offer significant benefits, while imposing minimal costs on affected entities. In particular, the rules we adopt in this *Fourth Report and Order* advance direction from Congress, via the Secure Networks Act and the Secure Equipment Act, to prohibit entities, equipment, and services deemed to pose unacceptable national security risks from gaining access to communication infrastructure. The Commission found in the *First Equipment Authorization Report and Order* that adopting prohibitions on the authorization of "covered" equipment "may result in economic impacts," but reiterated that the entities and equipment identified have been determined to pose unacceptable risks to national security.[82] Furthermore, the Commission noted that a certification process to attest that the entity is not identified on the Covered List and equipment is not identified as "covered" equipment, "is a reasonable and cost-effective method[.]"[83] Specifically, the Commission explained that "the attestation requirement is general, rather than a specific provision that directly relates to the equipment identified on the current Covered List" and therefore, the Commission opined that "most applicants will reply on boilerplate language, that once incorporated for a single certification, will be of negligible cost for an applicant to include in future applications."[84] Finally, the Commission explained that a certification or attestation requirement would be more cost-effective that alternatives such as a third-party verification process that would be more costly, take longer, and likely slow innovation.[85] Therefore, any costs imposed on entities by the Covered List-related certifications we adopt today are minimal and reasonable given the important national security objectives these rules serve.[86] We therefore

[81] *See infra* Appx. A, 47 CFR § 52.18(h) and (i). Suspension of a VoIP numbering authorization may result in suspension or denial of the authorization holder's access to new numbering resources. *Id.* § 52.18(h). *See also Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10492, para. 21.

[82] *First Equipment Authorization Order*, 37 FCC Rcd at 13580, para. 221. The Commission also noted that it has no discretion to ignore the national security determination and that a conventional cost-benefit analysis is not directly called for and that it would instead assess the cost-effectiveness and economic impact on affected entities. *Id*. at 13579, para. 219.

[83] *Id*. at 13580, para. 222.

[84] *Id.*

[85] *Id.*

[86] We estimate that the total burden on the industry to be less than $600,000 in the first year. We arrive at this total by using $96.22 per hour multiplied by an estimated two hours of labor multiplied by 3,000 providers. Consistent with prior Commission's calculations in Paperwork Reduction Act (PRA) statements, we estimate that a mid to senior-level personnel at the equivalent level of a GS-13 step 5 level would be required. To account for estimated benefits, we add 45% for a total hourly labor cost of $96.22(=$138,024 / 2,080 hours). (See 12 in PRA supporting statements found at https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202505-3060-029). Prior PRA filings highlight that annual recertification requirement under section 64.6305(h) for voice service provider, gateway provider, and non-gateway intermediate provider is a half hour and an additional half hour for Commission staff

conclude that the rules we adopt in this *Fourth Report and Order* will impose minimal costs on direct access applicants while lowering network costs and providing significant consumer benefits.

E. Legal Authority

30. As established in the *Second Report and Order* and *Third Report and Order*, section 251(e) of the Act provides sufficient authority for the requirements adopted in this *Fourth Report and Order*.[87] Section 251(e)(1) of the Act grants the Commission "exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States."[88] Based on this grant, in the *First Report and Order*, the Commission concluded that section 251(e)(1) provided it with authority "to extend to interconnected VoIP providers both the rights and obligations associated with using telephone numbers."[89] The Commission also has relied on section 251(e)(1) to require interconnected and one-way VoIP providers to implement the STIR/SHAKEN caller ID authentication framework and allow customers to reach the National Suicide Prevention Lifeline by dialing 988.[90] Consistent with the Commission's well-established reliance on section 251(e) numbering authority with respect to interconnected VoIP providers, we conclude that section 251(e)(1) allows us to further refine our processes and requirements governing direct access to numbers by interconnected VoIP providers.

31. We further conclude that the national security-focused certification rules we adopt today will further the Commission's implementation of the Secure Networks Act and Secure Equipment Act, by ensuring that VoIP providers seeking access to numbering resources do not rely on "covered" equipment and services, pursuant to 47 CFR § 1.50002 and 47 U.S.C. §§ 1601-1609.[91] As the Commission has found, protecting U.S. communications networks from entities and equipment that pose an unacceptable risk to national security, including the services and equipment appearing on the Covered List, is necessary and appropriate, and consistent with Congress's objectives in the Secure Networks Act and Secure Equipment Act.[92]

---

review. Staff estimate an additional half hour per filing based on experiences with providers certifying within other FCC databases and data collections. Therefore, two new certifications will result in two additional hours of labor. There are approximately 3,000 voice providers receiving numbering resources from the NANPA according to the FCC's December 2025 data from Somos. FCC staff found that there are only about 1,800 unique FRNs within the total 3,000 entities in NANP; therefore, 3,000 is an upper bound estimate. If every provider with interconnected VoIP opted to obtain numbering resources directly and was required to submit a certification, the total costs would be approximately $ $577,320 (= 3,000 providers* 2 hours * $96.22 per hour).

[87] The *First VoIP Direct Access Further Notice* proposed concluding that our authority for adopting the new or revised direct access to numbers application requirements for interconnected VoIP providers arises from section 251(e) of the Act. *First VoIP Direct Access Further Notice*, 36 FCC Rcd at 12926-28, paras. 42-43. No commenter opposed these proposals regarding the basis for our legal authority to adopt the requirements described in the *Second Report and Order*. *Second VoIP Direct Access Order and Further Notice*, 38 FCC Rcd at 8990, para. 75.

[88] 47 U.S.C. § 251(e)(1).

[89] *First VoIP Direct Access Order*, 30 FCC Rcd at 6878, para. 78.

[90] *See Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336, Report and Order, 35 FCC Rcd 7373, 7394, para. 40 (2020); *Call Authentication Trust Anchor*; *Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3260-61, para. 42 (2020) (*Caller ID Authentication First Report and Order*).

[91] *Third VoIP Direct Access Order and Further Notice*, 40 FCC Rcd at 10496, para. 31.

[92] *See, e.g.*, *Second Equipment Authorization Order*, 37 FCC Rcd 13510-11, paras. 34-38; *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Third Report and Order, 36 FCC Rcd 11958, 11970-71, paras. 30-31 (2021) (*Third Supply Chain Order*).

IV. FURTHER NOTICE OF PROPOSED RULEMAKING

32. In the accompanying *Fourth VoIP Direct Access Report and Order*, we strengthen our direct access rules with important national security-focused certifications and disclosures to ensure that all VoIP numbering authorizations continue to serve the public interest. As we face ever-increasing threats from bad actors domestically and abroad, we continue to explore new solutions to thwart illegal calls and unacceptable national security threats. Below, we propose measures to further bolster protections for consumers and numbering resources, while aiming to do so in a technology-neutral manner that promotes innovation and the transition to modern IP networks. We also seek comment on transparency-focused disclosure requirements and revisions and clarifications to our rules designed to enhance and streamline the vetting and review of direct access filings.

A. Presumptive Disqualifying Conditions

33. *Covered List-Related Disqualifying Conditions*. Building on the steps we take in the accompanying *Fourth Report and Order* to further protect the nation's numbering resources and communications networks, we propose to adopt a presumption that certain entities are not qualified to hold a VoIP numbering authorization due to the national security risks they present. In particular, we propose to adopt a presumption that any applicant for a VoIP numbering authorization that certifies either: (1) that it is an entity identified on the Covered List; or (2) that its network uses "covered" equipment and/or services that are based on producer/provider-based determinations, is not qualified to hold a VoIP numbering authorization. Under this proposal, any entity certifying to these conditions will have its application denied, unless it can overcome the adverse presumption.[93]

34. We believe that such a presumption of disqualification is consistent with agency-wide initiatives to protect licenses and authorizations from foreign adversaries and other entities posing threats to national security in other contexts.[94] Do commenters agree? We propose to apply this presumption prospectively to new applicants for direct access to numbers and that an applicant can overcome this adverse presumption only by establishing through clear and convincing evidence that the applicant does not fall within the scope of the adverse presumption or that grant of the application would not pose risks to national security.[95] We seek comment on this proposal, and any alternative approaches. What are the potential benefits and burdens? Should we apply this presumption to pending applications as well? Why, or why not?

35. Should we also adopt a similar disqualifying presumption with respect to entities disclosing that they are "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary" under section 1.70001(g) of our rules?[96] Why or why not? What other issues should the

---

[93] *See* 47 CFR § 1.70004(a); *First Submarine Cable Order*, 40 FCC Rcd at 6497-6501, paras. 30-35. We note that Congress has adopted a similar presumption in another context. *See* Uyghur Forced Labor Prevention Act, Pub. L. No. 117-78, §§ 2, 3, 135 Stat. 1525, 1526, 1529 (2021) (UFLPA); *see also* Department of Homeland Security, Notice Regarding the Uyghur Forced Labor Prevention Act Entity List, 90 Fed. Reg. 3899, 3900 (Jan. 15, 2025) (DHS UFLPA Entity List Notice) ("Beginning on June 21, 2022, the UFLPA requires the Commissioner of U.S. Customs and Border Protection to apply a rebuttable presumption that goods mined, produced, or manufactured by entities on the UFLPA Entity List are made with forced labor, and therefore, prohibited from importation into the United States under 19 U.S.C. 1307.").

[94] *See First Submarine Cable Order*, 40 FCC Rcd at 6497-6501, paras. 30-35; 47 CFR § 1.70004(a).

[95] *See First Submarine Cable Order*, 40 FCC Rcd at 6497-99, paras. 30-32 (adopting a clear and convincing evidentiary standard for the applicant to prove that it does not fall within the scope of adverse presumption "or that grant of the application would not pose risks to national security or that the national security benefits of granting the application would substantially outweigh any risks"); 47 CFR § 1.70004(a).

[96] *See Protecting Our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, GN Docket No. 25-166, Report and Order, FCC 26-2, 2026 WL 297882, at *4, para. 11 (Jan. 30, 2026)

Commission consider for this proposal in context of the VoIP numbering authorization? What process for adjudication should the Commission consider? Should resolution of these issues be delegated to the Bureau for streamlined processing?

36. We also seek comment on whether, and if so, how to apply the foregoing presumptions to existing direct access authorization holders. Should the Commission adopt the same approach with respect to certifications by existing authorization holders? Why or why not? Are there unique circumstances or equities with respect to existing authorization holders that would warrant our adopting a different process or standard of review? Should an existing authorization be suspended during the resolution of this process in accordance with § 52.18(h)?[97] Should there be a time limit for an authorization holder response before a revocation of the authorization is triggered? We note that the Commission has delegated authority to the Wireline and Enforcement bureaus to determine the parameters of the revocation process for a VoIP numbering authorization, "as required by due process and applicable law and in light of the relevant facts and circumstances, including providing the authorization holder with notice and opportunity to respond."[98] Are there conflicts between this existing provision and the proposals discussed above, or any additional measures that the Commission should consider with respect to revocation?

37. *Foreign Adversary Financing Agreement, Strategic Partnership, or Merger Presumptive Disqualifying Condition*. We also seek comment on adopting a presumption that an applicant is not qualified to hold a VoIP numbering authorization if it meets any of the criteria below, unless the applicant overcomes the adverse presumption. Specifically, as we did recently in the context of international section 214 authority,[99] we seek comment on adopting a disqualifying condition that will presumptively

(*Foreign Adversary Control Order*) (citing *First Submarine Cable Order*, 40 FCC Rcd at 6498, para. 31) (adopting a disqualifying condition that "will presumptively preclude the grant of a submarine cable application filed by any applicant . . . [t]hat is owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary, as defined in section 1.70001(g)"). Pursuant to section 1.70001(g) of our rules, the term "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary" applies to: (1) Any individual or entity, wherever located, who acts as an agent, representative, or employee, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign adversary or of an individual or entity whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in majority part by a foreign adversary; (2) Any individual, wherever located, who is a citizen of a foreign adversary or a country controlled by a foreign adversary, and is not a United States citizen or permanent resident of the United States; (3) Any entity, including a corporation, partnership, association, or other organization, that has a principal place of business in, or is headquartered in, incorporated in, or otherwise organized under the laws of a foreign adversary or a country controlled by a foreign adversary; or (4) Any entity, including a corporation, partnership, association, or other organization, wherever organized or doing business, that is owned or controlled by a foreign adversary, to include circumstances in which any person identified in paragraphs (1) through (3) of this section possesses the power, direct or indirect, whether or not exercised, through the ownership of a majority or a dominant minority (10% or greater) of the total outstanding voting interest and/or equity interest, or through a controlling interest, in an entity, board representation, proxy voting, a special share, contractual arrangements, formal or informal arrangements to act in concert, or other means, to determine, direct, or decide important matters affecting an entity. 47 CFR § 1.70001(g). As the Commission has previously explained, for purposes of section 1.70001(g)(4) of the Commission's rules, we treat a holder of 10% or greater of the total outstanding voting and/or equity interest in an entity as "possess[ing] the power . . . to determine, direct, or decide important matters affecting an entity." 47 CFR § 1.70001(g)(4); *Foreign Adversary Control Report and Order,* 41 FCC Rcd at 753, para. 16. Accordingly, to the extent that any individual or entity identified in section 1.70001(g)(1)-(3) possesses such an interest in an entity, such entity is covered by section 1.70001(g)(4).

[97] *See infra* Appx. A, 47 CFR § 52.18(h).

[98] *See infra* Appx. A, 47 CFR § 52.18(i).

[99] *See 2026 Evolving Risk Order and Further Notice*, at 108-10, paras. 193-196.

preclude the grant of an application for a VoIP numbering authorization filed by an applicant:

> (1) That has an agreement or plans to have an agreement, formal or informal, with entities "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary," as defined in section 1.70001(g),[100] to secure financing (such as business loans or bonds, debts, lines of credit, debt forgiveness, or in kind contributions or services) that might affect access to and/or the management or operation of international telecommunications services records, communications, equipment, facilities, services, functions, or operations; and
>
> (2) That has or will have strategic partnerships or mergers with entities "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary," as defined in section 1.70001(g),[101] that might affect access to and/or the management or operation of international telecommunications services records, communications, equipment, facilities, services, functions, or operations.[102]

38. We seek comment on applying this presumption to new applicants for direct access authorization as well as existing authorization holders. In order to effectuate this presumptive disqualifying condition, we seek comment on requiring new applicants and existing authorization holders to certify that they do not fall within the scope of the forgoing adverse presumptions or, in the alternative, to provide a detailed explanation of any relevant agreements or partnerships. We seek comment on this approach and any alternatives. Are there unique circumstances or equities with respect to existing authorization holders that would warrant our adopting a different process or standard of review?

39. In the *Evolving Risks Further Notice*, we proposed that an applicant can overcome this adverse presumption "only by establishing through clear and convincing evidence that the applicant does not fall within the scope of the adverse presumption . . . or that grant of the application would not pose risks to national security or that the national security benefits of granting the application would substantially outweigh any risks."[103] Would such an approach be appropriate in the context of Bureau review of direct access applications or authorizations? What would be the potential benefits and burdens of incorporating this presumptive disqualification into our direct access rules? In the *Evolving Risks Further Notice*, we tentatively found that "adopting this presumptive disqualifying condition is necessary to prevent national security and law enforcement risks raised by foreign adversary-controlled entities that may have involvement and influence, as well as opportunities for such, over matters affecting the management and operations of U.S. telecommunications services and infrastructure by providing financing or through strategic partnerships."[104] Would such a finding be appropriate with respect to entities seeking to obtain or maintain a VoIP numbering authorization? Why or why not? Should we also consider other arrangements through which foreign adversary-controlled entities may have involvement and influence? Should we adopt any exemptions to this presumptive disqualifying condition?

40. *Foreign Adversary Senior Official Presumptive Disqualifying Condition*. To further protect the security of the U.S. telecommunications networks against national security, law enforcement, and other threats, we seek comment on adopting a presumption that an applicant is not qualified to hold a VoIP numbering authorization if it meets any of the criteria below, unless the applicant overcomes the adverse presumption. Following the *Evolving Risks Further Notice*,[105] we seek comment on adopting a disqualifying condition that will presumptively preclude the grant of an application for a VoIP numbering

[100] 47 CFR § 1.70001(g).

[101] *Id*.

[102] *See 2026 Evolving Risk Order and Further Notice*, at 108, para. 193.

[103] *Id*. at 108, para. 194.

[104] *Id*. at 109, para. 195.

[105] *Id*. at 110-12, paras. 197-200.

authorization filed by any applicant where:

(1) Any senior official of the applicant or the applicant's parent company(ies) meets the definition of "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary" as that term is used in section 1.70001(g) of our rules;[106] and

(2) Any senior official of the applicant or any of the applicant's parent company(ies) performs and/or will perform duties from a foreign adversary country, as defined in section 1.70001(f),[107] pursuant to a VoIP numbering authorization.

41. We seek comment on applying this presumptive disqualifying condition to VoIP numbering authorization applicants and existing authorization holders. In order to effectuate this presumption, we seek comment on requiring direct access applicants and authorization holders to certify that they do not meet the foregoing criteria, or in the alternative, to disclose senior officials that meet the definition of "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary,"[108] and/or that perform or will perform duties from a foreign adversary country. We seek comment on whether an applicant can overcome this adverse presumption only by establishing through clear and convincing evidence that the applicant does not fall within the scope of the adverse presumption, as described above, or that grant of the application would not pose risks to national security.[109] Consistent with the *Evolving Risks Further Notice*,[110] we seek comment on defining "senior official" as a "board member or executive-level management, including an individual who performs the duties, or any of the duties, ordinarily performed by a president, vice president, secretary, treasurer, Chief Executive Officer, Chief Technical Officer, Chief Operations Officer, Chief Information Officer, and/or Chief Financial Officer, or other officer,"[111] and seek comment on whether this list should be illustrative and non-exhaustive.

42. We seek comment on this approach and any alternatives. Should we consider any exemptions to the presumptive disqualifying condition, and if so, what would be the justification for allowing any exception? Are there unique circumstances or equities that would warrant our adopting a different process or standard of review for existing authorization holders? Are there other factors that are relevant for our consideration under this presumptive disqualifying condition? Rather than adopting this presumptive disqualification, should we instead assess national security concerns related to foreign adversary senior officials on a case by case basis?

B. Security Measures

43. Following the *Evolving Risks Further Notice*, we also seek comment on whether to require direct access applicants and authorization holders to meet additional certification requirements related to security measures aimed at mitigating national security threats.[112] In particular, we seek comment on whether to: (1) prohibit the use of equipment and services produced or provided by foreign adversary-controlled entities and Covered List entities; (2) prohibit the use of any third-party service provider that is a foreign adversary-controlled entity; and (3) prohibit access to principal equipment, sensitive U.S. records, or domestic communications by individuals that meet the definition of "owned by,

[106] 47 CFR § 1.70001(g).

[107] 47 CFR § 1.70001(f).

[108] *2026 Evolving Risk Order and Further Notice*, at 110, para. 197.

[109] *See*, *e.g.*, 47 CFR § 1.70004(a); *2025 Submarine Cable First Report and Order*, 40 FCC Rcd at 6497-6501, paras. 30-35.

[110] *2026 Evolving Risk Order and Further Notice*, at 110-11, para. 198.

[111] *Id*.; *see also Second Submarine Cable Order*, at *65, para. 159.

[112] *Id*. at 117-126, paras. 213-232.

controlled by, or subject to the jurisdiction or direction of a foreign adversary" or located in foreign adversary countries.

44. *Use of Equipment and Services Produced or Provided by Foreign Adversary-Controlled Entities and Covered List Entities*. We seek comment on requiring direct access applicants to certify that, in their provision of interconnected VoIP service, they will not use any equipment or services that are produced (including any major stage of the process through which the device is made, including manufacturing, assembly, design, and development) or provided by any entity owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary, as defined in section 1.70001(g),[113] or any entity identified on the Covered List.[114] We also seek comment on whether to apply this requirement to existing direct access authorization holders. As we recognized in the *Evolving Risks Further Notice*,[115] we believe this proposal may yield significant national security benefits, but may also impose economic costs. If we were to adopt this proposal, should we also adopt any limitations or exemptions for particular types of equipment or services? We seek comment on the benefits and potential costs of this proposal, including those for smaller providers, and on any alternative approaches.

45. *Use of Third-Party Service Provider that is Foreign Adversary-Controlled Entity*. We seek comment on whether to adopt a certification requirement for direct access applicants that prohibits the use of certain third-party service providers that present national security risks. Specifically, we seek comment on whether to require direct access applicants to certify that in their provision of interconnected VoIP service, they will not use third-party service providers that are:

(1) An entity that is owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary, as defined in section 1.70001(g);

(2) An entity identified on the Covered List that the Commission maintains on its website pursuant to the Secure Networks Act, 47 U.S.C. §§ 1601 through 1609; and/or

(3) An entity that can access the telecommunications network, systems, communications, or records from a foreign adversary country, as defined in section 1.70001(f).[116]

46. We also seek comment on whether to require existing authorization holders to certify that they will not enter into a new agreement, or extension of an existing arrangement, with any such third-party service providers. Would adoption of these requirements be an appropriate means to further strengthen our VoIP direct access requirements and ensure that direct access applicants and authorization holders do not present undue national security risks? Why or why not? Would this approach unduly burden smaller providers? What would the costs and benefits of such a requirement be? If we were to adopt these certification requirements, we seek comment on employing the definition of "third-party service provider" recently proposed in the *Evolving Risks Further Notice*.[117] We seek comment on this approach and any alternatives.

47. *Foreign Adversary Access to Principal Equipment, Sensitive U.S. Records, or Domestic Communications*. We seek comment on whether we should adopt a certification for applicants and existing authorization holders that prohibits physical and/or remote access by any individual that meets

[113] 47 CFR § 1.70001(g).

[114] 47 CFR § 1.50002; *see also 2026 Evolving Risk Order and Further Notice*, at 117-18, paras. 213-216.

[115] *2026 Evolving Risk Order and Further Notice*, at 118, para. 216.

[116] *Id*. at 51-52, para. 68.

[117] *Id*. at 52-53, para. 69, Appx. B ("The term 'third-party service provider' as used in this part is defined as any third party entity that provides any service that could result in such entity having access to principal equipment as defined in § 63.09(j), domestic communications as defined in § 63.09(l), lawful U.S. process, or customer records for domestic or international telecommunications services, functions, or operations.")

the definition of "owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary" as that term is used in section 1.70001(g), or by any individual that is located in a foreign adversary country, as defined in section 1.70001(f), to any principal equipment, sensitive U.S. records, or domestic communications used by an authorization holder to provide communications services.[118] For purposes of this requirement, we seek comment on adopting the definition of "principal equipment" used in the *Evolving Risks Report and Order*,[119] and defining the terms "access,"[120] "sensitive U.S. records,"[121] and "domestic communications"[122] as proposed in the *Evolving Risks Further Notice*.

48. As we noted in the *Evolving Risks Further Notice*, "serious national security and law enforcement risks are raised where foreign adversaries have access to U.S.-based infrastructure and sensitive information traversing such infrastructure."[123] Do such concerns apply with respect to interconnected VoIP providers that are applicants for, or holders of, a direct access numbering authorization? Why or why not? What would the costs and benefits of such a certification requirement be? Are there unique circumstances that would warrant our adopting a different process or standard of review for existing authorization holders?

49. *Cybersecurity Baseline Standards*. We seek comment on whether we should require applicants and existing authorization holders to certify that their cybersecurity program protects their facilities and systems from threats that could affect their provision of services pursuant to the VoIP numbering authorization.[124] Should we require filers to certify that they adhere to baseline cybersecurity practices grounded in universally recognized standards and frameworks?[125] Why or why not? As we noted in the *Evolving Risks Further Notice*, "[w]e anticipate that this approach will help mitigate cybersecurity risks to telecommunications infrastructure, while allowing flexibility for companies to choose among existing standards and promoting harmonization with other FCC and federal cybersecurity

[118] *Id*. at 123, para 228.

[119] *Id*. at 12 n.63 (defining the term "principal equipment" to mean "all telecommunications and information network equipment (e.g., hardware, software, platforms, operating systems, applications, protocols) that supports telecommunications or information services, functions, or operations").

[120] *2026 Evolving Risk Order and Further Notice* at 123, para. 228 (proposing to define the term "access" to mean "to, or the right or ability to, enter a location or physical space; or physically or logically undertake any of the following actions: (1) Read, divert, or otherwise obtain non-public information or technology from or about software, hardware, a system, or a network; (2) Add, edit, or alter information or technology stored on or by software, hardware, a system, or a network; and (3) Alter the physical or logical state of software, hardware, a system, or a network (e.g., turning it on or off, changing configuration, removing or adding components or connections)").

[121] *Id*. (proposing to define the term "sensitive U.S. records" to mean an applicant's or authorization holder's end-user billing records, Subscriber Information, personally identifiable information (PII), Sensitive Personal Data as described in 31 CFR § 800.241, internet protocol detail record (IPDRs), and information subject to disclosure to a U.S. federal or state governmental entity under the procedures set forth in 18 U.S.C. § 2703(c) and (d) and 18 U.S.C. § 2709").

[122] *Id*. at 123-24, para. 229 (proposing to define the term "domestic communications" to mean "(1) Wire Communications or Electronic Communications, as defined by 18 U.S.C. § 2510, (whether stored or not), from one location within the United States, including its territories, to another location within the United States; or (2) the U.S. portion of a Wire Communication or Electronic Communication (whether stored or not) that originates or terminates in the United States or its territories").

[123] *Id*. at 125-26, para. 231.

[124] *See id*. at 55-56, para. 74.

[125] *Id*. As discussed in the *Evolving Risk Further Notice*, examples of internationally recognized cybersecurity standards and best practices include the NIST Cybersecurity Framework and the CISA Cross-Sector Cybersecurity Performance Goals. *Id*. at 58, para. 78.

requirements."[126] Would such a finding be applicable in the context of our VoIP numbering authorization rules? What are the potential benefits and/or costs of such an approach? Should we consider alternative measures? Are there unique impacts on existing authorization holders that would warrant a different approach or additional measures? Would this requirement create unique burdens for smaller providers?

50. *Cybersecurity and Physical Security Risk Management Plans*. We seek comment on whether we should require applicants and existing authorization holders to certify that they have created and implemented, and will update as necessary, cybersecurity and physical security risk management plans that identify the cyber and physical risks they face, the controls they use or plan to use to mitigate those risks, and how they will ensure that these controls are applied effectively to their operations.[127] As we recently proposed in the *Evolving Risks Further Notice*, should we require that a risk management plan: "(1) demonstrates that the applicant or authorization holder has analyzed security risks and (2) describes the entity's implement of security controls sufficiently to ensure the confidentiality, integrity, and availability of all aspects of its telecommunications systems and services[?]"[128] Why or why not? Are there additional or different requirements we should consider? Should we adopt a more standardized or flexible approach regarding risk management plan contents? What record-keeping requirements should we require for applicants and authorization holders?[129] We seek comment on whether to adopt the foregoing requirements for direct access applicants and, if so, whether to also apply these rules to existing authorization holders. Would any of the foregoing measures unduly burden small providers? What are the potential costs and benefits associated with developing and maintaining a risk management plan? Finally, should we adopt a presumption that a compliant risk management plan satisfies the requirement to adhere to baseline standards?[130]

C. Updating Requirements for Applicants and Authorization Holders

51. *Corporate History Disclosure*. We seek comment on revisions to 47 CFR § 52.18(b)(12), which governs the domestic and foreign ownership disclosure requirement, to require new applicants to also disclose any transfers of control, ownership, assignments, entity name changes, or leadership changes for the past 5 years as of the filing date of the application.[131] The Commission seeks greater insight into the entities that are filing for VoIP numbering authorizations and to ensure that these entities are not attempting to circumvent the Commission's rules regarding ownership disclosures to shield the identity of bad actors or entities that would warrant further investigation or rejection. We seek comment on this proposal. How should we define the types of leadership changes that would be subject to disclosure? With respect to changes in ownership, should we restrict disclosure requirements to roles with a voting and/or equity interest similar to those outlined in 47 CFR § 63.18(h)? Should we require thresholds of ownership disclosures for reporting? Currently, the threshold is 10% or greater for disclosure of foreign ownership for applicants when filing for a VoIP numbering authorization and for authorization holders when reporting post-grant changes. Should we require 10% as the threshold for this proposal? Given the increasing concerns with foreign bad actors and national security risks, should we require a 5% threshold, consistent with national security orders?[132] Should we increase or decrease the time period required for such reporting? Is there additional information we should also collect about the corporate history of a

[126] *Id.*

[127] *2026 Evolving Risk Order and Further Notice* at 128-29, para. 237.

[128] *Id*. at 129-30, para. 239.

[129] *Id*. at 130, para. 242.

[130] *Id*.

[131] *See infra* Appx. A, 47 CFR § 52.18(b)(12) (referencing 47 CFR § 63.18(h) and (i) in the rule).

[132] *Foreign Adversary Control Order* at *20, para. 46 (adopting rules that require licensees to report Foreign Adversary Control at 5% or greater).

filing entity or certain affiliates to achieve our goals? What type of disclosures, if any, should we require as it pertains to foreign entity affiliation? Would it be more impactful to focus on foreign VoIP affiliate disclosures, or maintain a broader disclosure for foreign affiliates of any type? What are the potential benefits and burdens of such a proposal? We believe that such information will be readily available to the filing entity and part of recordkeeping practices and therefore anticipate that any burden of production will be minimal. Do commenters agree? Would this proposal create unfair burdens on larger entities with multiple levels of leadership or that may have higher rates of leadership turnover? What alternative methods for minimizing burdens on impacted entities should we consider? Should we extend this proposal to existing authorization holders as well? What are the costs and benefits of such an approach?

52. *Physical Address Disclosure*. We seek comment on requiring new applicants and existing authorization holders to disclose a physical, commercial address of a bona fide place of business for the entity that denotes the geographic location where the provider does business, rather than a virtual office, mailing or delivery box, registered agent, or other such addresses that shields the entity's location.[133] Section 52.18(b)(1) of our direct access rules, requires that an applicant provide, inter alia, an "address," which we interpret to mean a physical location. In reviewing scores of filings, Bureau staff have observed that some applicants provide an address to a co-working space, a business that provides a virtual office for businesses, a delivery service mailing center, or other such locations. The measures we propose today are designed to increase transparency into entities filing for a VoIP numbering authorization and prevent bad actors from circumventing our rules and vetting process. What are the potential benefits and burdens associated with this proposal? Should we require that applicants and authorization holders submit evidence demonstrating that they are actually operating out of the physical address provided to the Commission? If so, what kinds of documentation or other evidence would be probative? For instance, should we require that entities submit with their filing to the Commission a copy of a utility bill? How, if at all, should we account for entities that operate out of a residential location? In such cases, should we require documentation that the entity is operating as a registered business? Is there additional information we should consider in the disclosure requirement?

53. *Business Model Narrative and Numbering Resource Usage Disclosure*. We seek comment on requiring new applicants to submit with their filing a narrative describing the business model for their company and a detailed disclosure of how numbering resources will be used.[134] As we seek ways to increase transparency into entities filing for and receiving a VoIP numbering authorization, we anticipate that this disclosure will provide greater insight into the types of businesses seeking numbering resources and their qualifications to receive an authorization. We also anticipate that for an established business, providing such information should be fairly straightforward and minimally burdensome. Do commenters agree? What are the potential burdens or benefits of such an approach? What specific information or data should applicants include? Should applicants include call flow diagrams, business plans, or other such supporting documentation? What are the costs and benefits associated with requiring applicants to update their filings if their business model or intended numbering resource usage changes

[133] *See Improving the Effectiveness of the Robocall Mitigation Database* et al., WC Docket No. 24-213 et al., Further Notice of Proposed Rulemaking, FCC 26-49, at 25-26 (July 22, 2026) ("[A] physical address that is a bona fide place of business for the upstream provider and is not a virtual address, shared office location without a dedicated suite of floor, P.O. Box, mail forwarding service, hosted server location, registered agent, or address shared by multiple unrelated or purportedly unrelated businesses."); *Call Authentication Trust Anchor, Advanced Methods to Target and Eliminate Unlawful Robocalls*, WC Docket No. 17-97, CG Docket No. 17-59, Further Notice of Proposed Rulemaking, FCC 26-32, at 11 ("A physical address . . . is a real place of business for the upstream provider and is not a virtual address, shared office location without a dedicated suite or floor, P.O. Box, mail forwarding service, hosted server location, registered agent, or address shared by multiple unrelated or purportedly unrelated businesses[.]").

[134] We remind filers that they may request confidential treatment of sensitive business information pursuant to our rules. *See* 47 CFR § 0.459.

materially? Should we require existing authorization holders update their filing with such information? Are there specific concerns with respect to authorization holders regarding this proposal that we should consider? Should we extend this proposal to existing authorization holders as well? What are the costs and benefits of such an approach?

54. *Affiliate and Resale Numbering Resource Usage*. We seek comment on requiring new applicants and existing authorization holders to provide with their filing a list of any and all affiliates (as defined in section 3(2) of the Act)[135] that are or will be direct or indirect wholesale customers of the VoIP numbering authorization holder. We also seek comment on requiring providers to certify that the list provided is complete and that no other affiliates of the VoIP numbering authorization holder are or will be providing service using the numbering resources obtained via the authorization. Is there any reason why we should not use the definition of affiliate in the Act? Do commenters believe that it is too broad? Finally, we seek comment on requiring an acknowledgment that the provider will bear compliance responsibility for the entities identified on the list submitted with the filing. We believe these requirements will aid us in gaining further insight into entities that access and use numbering resources, as well as enforcement efforts. What are the potential benefits and harms of this proposal? Alternatively, we seek comment on requiring each affiliated entity that intends to use numbering resources to obtain a separate VoIP numbering authorization. Do commenters agree with this approach? What are the benefits and costs associated with the proposal?

55. *Facilities Readiness*. Per our rules, an interconnected VoIP provider seeking access to numbers must demonstrate that it is, or will be, "capable of providing service within sixty (60) days of the numbering resources activation date[.]"[136] Adopting a flexible approach to the documentation submitted, the Commission determined that this can be illustrated by "(1) providing a combination of an agreement between the interconnected VoIP provider and its carrier partner and an interconnection agreement between that carrier and the relevant local exchange carrier, or (2) proof that the interconnected VoIP provider obtains interconnection with the PSTN [Public Switched Telephone Network] pursuant to a tariffed offering or a commercial arrangement (such as a TDM-to-IP or a VoIP interconnection agreement) that provides access to the PSTN."[137] As we have reiterated, a particular geographic location where the interconnected VoIP provider delivers traffic to or accepts traffic from the PSTN need not be demonstrated; rather, in order to satisfy the facilities readiness requirement, submitted documentation should illustrate the provider can "receive calls that originate on the [PSTN] and to terminate calls to the [PSTN]."[138]

56. We seek comment on whether updates to the facilities readiness requirement are warranted in light of changes in technology and numbering resource use, as well as the increase in bad actors seeking to exploit numbering resources. Should we change the requirement in order to better protect numbering resources? If so, what type of documents or technical specifications should an applicant provide with their submission? While we have previously maintained a flexible approach to these requirements, should we standardize the type of documentation to satisfy the facilities readiness requirement? What are the potential benefits and harms of such an approach? We anticipate that standardizing the required documentation—and codifying the key documentation requirements—could assist new applicants in better understanding what is expected of them, streamline the review and vetting process, and decrease the overall time it takes for the Bureau to release an application. Do commenters

[135] 47 U.S.C. § 153(2) (defining "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person" and "for purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent").

[136] *Infra* Appx. A, 47 CFR § 52.18(b)(8); *see also First VoIP Direct Access Order*, 30 FCC Rcd at 6856, para. 36.

[137] *First VoIP Direct Access Order*, 30 FCC Rcd at 6856-57, para. 37.

[138] *Id.*

agree? Could there be burdens for certain types of applicants or business models? If so, what type of businesses are likely impacted by such standardization? What steps could the Commission take to mitigate any negative impacts? Alternatively, if we were to maintain a flexible approach for documentation, should we retain or modify the existing guidance (as stated in paragraph 37 of the *First VoIP Direct Access Order*) and codify that guidance in our rules?[139] We propose that any updated facilities readiness requirements should also apply to existing authorization holders. Do commenters agree? What are the costs and benefits of such an approach?

57. Additionally, we seek comment on requiring authorization holders to update their facilities readiness documentation on a periodic basis, for example, every 3-5 years. Under our rules, authorization holders are required to maintain the accuracy of contact information, certifications, and ownership/affiliation information in order to maintain their authorizations.[140] Should facilities readiness documentation be added to this requirement? Should we create a separate requirement to periodically report changes to facilities readiness? Should providers update their filings with each material change, or only recertify at a given interval? Should we consider a different time period for this requirement? We believe that requiring such updates would ensure that Commission staff, numbering administrators and state commissions would have current network information about providers in order to evaluate whether the entity can continue to properly facilitate numbering usage, and if the authorization continues to serve the public interest. What would be the potential burdens of such a requirement? Are there alternative options that we should consider that would also achieve our goals? Additionally, what would be the consequences if providers fail to timely provide the required facilities readiness documentation?

58. *Key Managerial and Technical Personnel*. We seek comment on whether the Commission should specify which positions and technical expertise will satisfy the requirement under our direct access rules that an applicant seeking an VoIP numbering authorization possesses the "financial, managerial, and technical expertise to provide reliable service."[141] Pursuant to our rules, applicants need to identify "key management and technical personnel such as the Chief Operating Officer and the Chief Technology Officer, or equivalent[.]"[142] Should we require that a Chief Information Security Officer or equivalent be one of the positions specified to ensure the security aspects of reliable service are provided? Are there other roles or positions that we should require an applicant to disclose? In an ongoing effort to gain greater insight into the entities applying for numbering resource access and ensure that all VoIP numbering authorizations serve the public interest, we seek comment on whether we should require specific supporting documentation on certain officer or leadership positions to fulfill this requirement. What are the potential benefits and burdens of such a rule? Would it help ensure that established and stable businesses are receiving numbering resources? Are there other threshold technical requirements, or other alternatives, that we should require applicants to demonstrate in order qualify for a VoIP numbering authorization? We propose that any updated key managerial and technical personnel requirements should also apply to existing authorization holders. Do commenters agree? What are the costs and benefits of such an approach?

59. *Recertification Timeline*. With respect to the above proposals, should we require that applicants and existing authorization holders submit the proposed updated certifications and information disclosures within 30 days after the effective date of an order adopting such rules? Does this deadline strike the right regulatory balance? What are the potential benefits and burdens of such a time period? Should we consider a longer, or shorter, period of time?

60. *Authorization Renewal Requirement*. Should we impose, prospectively, a renewal

[139] *Id*.

[140] *See infra* Appx. A, 47 CFR § 52.18(j)(1).

[141] *See infra* Appx. A, 47 CFR § 52.18(b)(11).

[142] *Id.*

requirement on VoIP numbering authorizations? As we examine additional measures to increase transparency and accountability for those with direct access to numbering resources, would this proposal achieve our goals? What time limit should we consider? What kind of re-submission process would be minimally burdensome on providers while ensuring that the Commission and the NANPA have updated information from authorization holders to ensure that authorizations continue to serve the public interest? What are the potential benefits and burdens associated with adopting a renewal requirement for direct access authorizations? If we were to adopt an authorization renewal requirement, how should the Commission handle affected VoIP providers' access to numbers that had been acquired through authorizations that have expired and not renewed? Are there other solutions that serve as viable alternatives to having a VoIP numbering authorization expire if not renewed? We anticipate that a renewal requirement would apply to applications that remain pending when such a rule becomes effective. Do commenters agree?

61. *Other Proposals*. Finally, we seek comment on any other additional measures we should consider that would help to make the direct access process more efficient or that would further safeguard numbering resources and bolster protections against illegal calls and unacceptable national security risks.

D. Application Review and Authorization Oversight

62. *Authorization Holder Change of Information*. We seek comment on whether the Bureau should release a public notice at the conclusion of its review of reported ownership and transfer of control changes when reported by an authorization holder.[143] Currently, authorization holders submit changes to the established administrative docket.[144] While this enables the post-grant reporting to be made publicly and in a centralized location, the Bureau does not release a public notice at the conclusion of its review. We believe that releasing individual or batch public notices will provide benefit to authorization holders who will have a public-facing resolution of the reported information and we also believe this proposal will assist the NANPA, other administrators (e.g., NPAC), as well as our federal and state partners by increasing transparency into such reported ownership and transfer of control information. Do commenters agree? What are the benefits and harms of the proposal? Should we consider alternative processes? Are there other administrator-facing measures that we should consider to further streamline the management and oversight of post-grant reporting by authorization holders? Requests for confidential treatment of sensitive business information can be made, pursuant to our rules.[145] What other privacy and confidential filing concerns should the Commission consider?

63. *Clarifying Bureau Delegated Authority to Reject or Release Applications Directly on Non-streamlined Processing*. In order to increase the transparency and efficiency of the direct access application review process, we propose making a number of administrative revisions and clarifications to our rules, as detailed in Appendix B below.[146] In particular, we propose revising section 52.18(e) to codify the Bureau's existing practice to accept an application for non-streamlined processing directly in circumstances where "removal" from streamlined processing would be appropriate under section 52.18(e).[147] We also propose revising section 52.18(g) to clarify that the Bureau is not required to seek

[143] *See infra* Appx. A, 47 CFR § 52.18(j)(1).

[144] *See infra* Appx. A, 47 CFR § 52.18(c) (requiring all filings to be submitted through the Commission's Electronic Comment Filing System (ECFS)); *Third VoIP Direct Access Order*, 40 FCC Rcd at 10486-87, para. 11. Currently, authorization holders submit updates to their filing to INBOX-52.15 (x). Once the rule reorganization we adopt here becomes effective, authorization holders will submit updates to INBOX-52.18 (j).

[145] 47 CFR § 0.459.

[146] *See infra* Appx. B.

[147] *See infra* Appx. B, 47 CFR § 52.18(e)(1)–(5). If an application discloses that the applicant has reportable ownership by a foreign person or entity, the Bureau shall remove the application from streamlined processing. The

comment before rejecting an application in the circumstances enumerated in section 52.18(g).[148] Finally, we propose revising sections 52.18(g) and 52.18(i) to explicitly include Foreign Adversary control among the enumerated circumstances under which the Bureau may reject an application or revoke an authorization.[149]

64. These proposals are designed to promote transparency by clarifying the Bureau's existing delegated authority to ensure that direct access authorizations serve the public interest. Do commenters agree with these proposals? Are there potential benefits and burdens we should consider? Are there additional clarifications to our existing rules or processes that we should adopt in addition to, or instead of, these amendments?

V. PROCEDURAL MATTERS

65. *Regulatory Flexibility Act*. The Regulatory Flexibility Act of 1980, as amended (RFA),[150] requires that an agency prepare a regulatory flexibility analysis for notice and comment rulemakings, unless the agency certifies that "the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."[151] Accordingly, the Commission has prepared a Final Regulatory Flexibility Analysis (FRFA) concerning the possible impact of the rule changes contained in this *Fourth Report and Order* on small entities. The FRFA is set forth in Appendix C.

66. The Commission has also prepared an Initial Regulatory Flexibility Analysis (IRFA) concerning the potential impact of rule and policy change proposals on small entities in the *Fourth Further Notice of Proposed Rulemaking*. The IRFA is set forth in Appendix D. The Commission invites the general public, in particular small businesses, to comment on the IRFA. Comments must be filed by the deadlines for comments on the *Fourth Further Notice* indicated on the first page of this document and

---

Bureau may also remove an application from streamlined processing at its discretion for other reasons. The Bureau shall notify the applicant by public notice that it is removing the application from streamlined processing, and shall state the reason for the removal. An application may also receive non-streamlined processing if: (1) an applicant fails to respond promptly to Commission inquiries; (2) an application is associated with a non-routine request for waiver of the Commission's rules in this chapter; (3) an application would, on its face, violate a Commission rule in this chapter or the Communications Act; (4) timely filed comments on the application raise public interest concerns that require further Commission review; or (5) the Bureau determines that the application requires further analysis to determine whether granting the application serves the public interest. *Id*. Release of direct access applications on non-streamlined processing is consistent with the Bureau's existing practice and delegated authority to process applications with foreign ownership and those warranting further examination. *Id.*

[148] *See infra* Appx. B, 47 CFR § 52.18(g)(1)-(4). The Bureau may reject an application by announcing the rejection, the reasons for the rejection, and whether the rejection is with or without prejudice via public notice if it determines or has a reasonable basis to believe that: (1) The applicant cannot satisfy the qualification requirements for a Commission authorization under this paragraph (b); (2) The applicant has made a false statement or certification to the Commission; (3) The applicant has engaged in behavior contrary to the public interest; or (4) Granting the application would not serve the public interest. *Id*.

[149] *See generally*, *Foreign Adversary Control Order*, at *1; *see also* 47 CFR §1.70001(e), (g) (outlining definitions for "foreign adversary" and foreign adversary control). The Commission has already adopted a procedure on the revocation process for all FCC regulatees, including VoIP numbering authorization holders, when there is reported ownership, control, jurisdiction, and/or direction by a foreign adversary. *See* 47 CFR § 1.80004; *see also Foreign Adversary Control Order* at *37-39, paras. 88-96 (referring to revocation based on "assess[ment] that Foreign Adversary Control of the Covered Authorization may pose an unacceptable risk to national security"). With this *Fourth Further Notice*, we do not intend to disturb or re-open the established revocation process and any future action stemming from this *Fourth Further Notice* would not supplant that.

[150] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[151] *Id.* § 605(b).

must have a separate and distinct heading designating them as responses to the IRFA.

67. *Paperwork Reduction Act*. This *Fourth Report and Order* may contain new or modified information collection requirements subject to the Paperwork Reduction Act of 1995 (PRA), Public Law 104-13. Specifically, the rules adopted in 52.18(b) may require new or modified information collections. All such new or modified information collection requirements will be submitted to the Office of Management and Budget (OMB) for review under Section 3507(d) of the PRA. OMB, the general public, and other Federal agencies will be invited to comment on the new or modified information collection requirements contained in this proceeding. In addition, we note that pursuant to the Small Business Paperwork Relief Act of 2002, Public Law 107-198, *see* 44 U.S.C. § 3506(c)(4), we previously sought specific comment on how the Commission might further reduce the information collection burden for small business concerns with fewer than 25 employees. In this document, we describe several steps we have taken to minimize the information collection burdens on small entities.[152]

68. The *Fourth Further Notice* also may contain proposed new and revised information collection requirements. The Commission, as part of its continuing effort to reduce paperwork burdens, invites the general public and OMB to comment on the information collection requirements contained in this document, as required by the Paperwork Reduction Act of 1995, Public Law 104-13. In addition, pursuant to the Small Business Paperwork Relief Act of 2002, Public Law 107-198, *see* 44 U.S.C § 3506(c)(4), we seek specific comment on how we might further reduce the information collection burden for small business concerns with fewer than 25 employees.

69. *Congressional Review Act*. The Commission has determined, and the Administrator of the Office of Information and Regulatory Affairs, OMB, concurs, that this rule is non-major under the Congressional Review Act, 5 U.S.C. § 804(2). The Commission will send a copy of this *Fourth Report and Order* and *Fourth Further Notice of Proposed Rulemaking* to Congress and the Government Accountability Office pursuant to 5 U.S.C. § 801(a)(1)(A).

70. *Providing Accountability Through Transparency Act*. Consistent with the Providing Accountability Through Transparency Act, Public Law 118-9, a summary of the *Fourth Further Notice* will be available on https://www.fcc.gov/proposed-rulemakings.

71. *OPEN Government Data Act*. The OPEN Government Data Act,[153] requires agencies to make "public data assets" available under an open license and as "open Government data assets," *i.e.*, in machine-readable, open format, unencumbered by use restrictions other than intellectual property rights, and based on an open standard that is maintained by a standards organization.[154] This requirement is to be implemented "in accordance with guidance by the Director" of OMB.[155] The term "public data asset" means "a data asset, or part thereof, maintained by the Federal Government that has been, or may be, released to the public, including any data asset, or part thereof, subject to disclose under [the Freedom of Information Act (FOIA)]."[156] A "data asset" is "a collection of data elements or data sets that may be grouped together,"[157] and "data" is "recorded information, regardless of form or the media on which the

[152] *See infra* Appx. B at paras. 12-14.

[153] Congress enacted the OPEN Government Data Act as Title II of the Foundations for Evidence-Based Policymaking Act of 2018, Pub. L. No. 115-435 (2019), §§ 201-202.

[154] 44 U.S.C. § 3502(20), (22) (definitions of "open Government data asset" and "public data asset"), 3506(b)(6)(B) (public availability).

[155] *See* OMB Memorandum M-25-05, *Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance* (Jan. 15, 2025).

[156] 44 U.S.C. § 3502(22).

[157] 44 U.S.C. § 3502(17).

data is recorded."[158] We delegate authority to the Wireline Competition Bureau (WCB), in consultation with the agency's Chief Data and Analytics Officer and after seeking public comment to the extent it deems appropriate, to determine whether any data assets maintained or created by the Commission pursuant to the rules adopted in the *Fourth Report and Order* are "public data assets" and if so, to determine when and to what extent such information should be published as "open Government data assets." In doing so, WCB shall take into account the extent to which such data asserts should be made publicly available because they are not subject to disclosure under the FOIA. *See, e.g.,* 5 U.S.C. § 552(B)(4), (6)-(7) (exemptions concerning confidential commercial information, personal privacy, and information compiled for law enforcement purposes, respectively).

72. *Comment Period and Filing Procedures.* Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). *See Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing ECFS: https://www.fcc.gov/ecfs.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. **All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission**.
  - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any delivers not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

73. Comments and reply comments must include a short and concise summary of the substantive arguments raised in the pleasing. Comments and reply comments must also comply with section 1.49 and all other applicable sections of the Commission's rules. We direct all interested parties to include the name of the filing party and the date of the filing on each page of their comments and reply comments. All parties are encouraged to use a table of contents, regardless of the length of their submissions. We also strongly encourage parties to track the organization set forth in the *Fourth Further Notice* in order to facilitate our internal review process.

74. *People with Disabilities*. To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-0530.

75. *Ex Parte Presentations—Permit-But-Disclose.* The proceeding this *Fourth Further Notice* initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.[159] Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the

[158] 44 U.S.C. § 3502(16).

[159] 47 CFR § 1.1200 *et seq.*

presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with section 1.1206(b) of the Commission's rules. In proceedings governed by section 1.49(f) of the Commission's rules or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.[160]

76. *Availability of Documents.* Comments, reply comments, and *ex parte* submissions will be publicly available online via ECFS.

77. *Further Information*. For further information, contact Jordan Reth, at (202) 418-1418 or Jordan.Reth@fcc.gov or DAA@fcc.gov.

VI. ORDERING CLAUSES

78. Accordingly, IT IS ORDERED that pursuant to sections 1, 3, 4, 251, and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 153, 154, 251, 303(r), and 47 U.S.C. § 227b-1, the *Fourth Report and Order and Fourth Further Notice of Proposed Rulemaking* hereby IS ADOPTED and Part 52 of the Commission's Rules, 47 CFR Part 52, IS AMENDED as set forth in Appendix A.[161] The *Fourth Report and Order* shall become effective 30 days after publication in the Federal Register. The changes to section 52.18(b) adopted herein may contain new or modified information collection requirements subject to OMB review under the Paperwork Reduction Act. The Commission directs the Wireline Competition Bureau to announce the compliance date for those requirements in a document published in the Federal Register after the completion of OMB review and to cause section 52.18(b) to be revised accordingly.

79. IT IS FURTHER ORDERED that the Commission's Office of the Secretary, SHALL SEND a copy of this *Fourth Report and Order and Fourth Further Notice of Proposed Rulemaking*, including the Final and Initial Regulatory Flexibility Analyses, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.

80. IT IS FURTHER ORDERED that the Office of the Managing Director, Performance Evaluation and Records Management, SHALL SEND a copy of this *Fourth Report and Order* in a report

[160] *Id.* § 1.49(f).

[161] Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 20, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 68708 (Dec. 28, 1993).

to be sent to Congress and the Government Accountability Office pursuant to the Congressional Review Act, see 5 U.S.C. § 801(a)(1)(A).

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

APPENDIX A

Final Rules

The Federal Communications Commission amends part 52 of Title 47 of the Code of Federal Regulations as follows:

PART 52 – NUMBERING

1. The authority citation for part 52 is revised to read as follows:

Authority: 47 U.S.C. 151, 152, 153, 154, 155, 201-205, 207-209, 218, 225-227, 227b-1, 251-252, 271, 303, 332, unless otherwise noted.

2. Amend § 52.15 by removing and reserving paragraph (g)(3), to read as follows:

(g) ***Applications for numbering resources*** —

* * * * *

(3) [Reserved]

* * * * *

3. Add new section § 52.18 to read as follows:

§ 52.18 Interconnected VoIP provider numbering authorization.

A provider of interconnected VoIP service may show a Commission authorization obtained pursuant to this section as evidence that it is authorized to provide service under § 52.15(g)(2).

(a) ***Definition.*** The term *foreign carrier* found in this section is given the same meaning as in § 63.09(d) of this chapter.

(b) ***Contents of the application for interconnected VoIP provider numbering authorization.*** An application for authorization must reference this section and must contain the following:

(1) The applicant's name, address, and telephone number and contact information for personnel qualified to address issues relating to regulatory requirements, compliance with Commission's rules in this chapter, 911, and law enforcement;

(2) An acknowledgment that the authorization granted under this section is subject to compliance with applicable Commission numbering rules in this part; numbering authority delegated to the states, and the state laws, regulations, and registration requirements applicable to businesses operating in each state where the applicant seeks numbering resources; and industry guidelines and practices regarding numbering as applicable to telecommunications carriers;

(3) A certification that the applicant will not use the numbers obtained pursuant to an authorization under this section to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 through 64.6308 of this chapter and 16 CFR 310.3(b);

(4) A certification that the applicant has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 through 64.6305 of this chapter;

(5) A certification with accompanying evidence that the applicant complies with its 911 obligations under part 9 of this chapter, and that it complies with the provisions of the Communications Assistance with Law Enforcement Act, 47 U.S.C. 1001 *et seq.* Wireline Competition Bureau (Bureau) or other Commission staff may request additional documentation from the applicant to demonstrate compliance with these public safety obligations, where necessary;

(6) A certification that the applicant complies with the Access Stimulation rules under § 51.914 of this chapter;

(7) An acknowledgment that the applicant must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators;

(8) Proof that the applicant is or will be capable of providing service within sixty (60) days of the numbering resources activation date in accordance with § 52.15(g)(2);

(9) Proof that the applicant has filed FCC Forms 477 and 499, or a statement explaining why each such form is not yet applicable;

(10) A certification that the applicant complies with its applicable Universal Service Fund contribution obligations under part 54, subpart H, of this chapter, its Telecommunications Relay Service contribution obligations under § 64.604(c)(5)(iii) of this chapter, its NANP and local number portability (LNP) administration contribution obligations under §§ 52.17 and 52.32 of this chapter, and its obligations to pay regulatory fees under § 1.1154 of this chapter;

(11) A certification that the applicant possesses the financial, managerial, and technical expertise to provide reliable service. This certification must include the name of applicant's key management and technical personnel, such as the Chief Operating Officer and the Chief Technology Officer, or equivalent, and state that neither the applicant nor any of the identified personnel are being or have been investigated by the Commission, law enforcement, or any regulatory agency for failure to comply with any law, rule, or order, including the Commission's rules in this chapter applicable to unlawful robocalls or unlawful spoofing;

(12) The same information, disclosures, and certifications required by § 63.18(h) and (i) of this chapter;

(13) A certification pursuant to §§ 1.2001 and 1.2002 of this chapter that no party to the application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, *see* 21 U.S.C. 862;

(14) A certification that the applicant is not an entity identified on the Covered List, including named entities and their current and future affiliates and subsidiaries, and any entity included by reference therein, as those terms are defined in 47 CFR § 2.903(e), or, in the alternative, a detailed explanation identifying the relevant Covered List entry and the specific relationship of the identified entity to the applicant.

(15) A certification that the applicant's networks do not use communications equipment and/or services, as defined in 47 U.S.C. § 1608(5), that are based on producer/provider-based determinations, identified on the Covered List or, in the alternative, a detailed accounting of any such covered equipment or services used in the applicant's networks, detailing the specific use at issue, and any proposed mitigation or remediation measure.

(16) A certification that the applicant is not and has not been subject to the denial or revocation of an international and/or domestic section 214 authorization based on national security or law enforcement grounds;

(17) A list of states where the applicant initially intends to request numbering resources; and

(18) A declaration under penalty of perjury pursuant to § 1.16 of this chapter that all statements in the application and any appendices are true and accurate. This declaration shall be executed by an officer or other authorized representative of the applicant.

(19) Paragraphs (b)(14), (b)(15), (b)(16), and (b)(17) of this section contain new information-collection requirements. Compliance with paragraphs (b)(14), (b)(15), (b)(16), and (b)(17) will not be required until this paragraph (b)(19) is removed or contains a compliance date.

(c) ***Filing procedure.*** An applicant for Commission authorization under this section must file its application electronically through the "Submit a Non-Docketed Filing" module of the Commission's Electronic Comment Filing System (ECFS). Each application shall be accompanied by the fee prescribed in part 1, subpart G, of this chapter.

(d) ***Public notice and review period for streamlined pleading cycle.*** Upon determination by the Bureau that the applicant has filed a complete application that is appropriate for streamlined treatment, the Bureau will assign a docket number to the application and issue a public notice stating that the application has been accepted for filing as a streamlined application. The applicant must make all subsequent filings relating to its application in this docket. Parties may file comments addressing an application for authorization no later than 15 days after the Bureau releases a public notice stating that the application has been accepted for filing, unless the public notice specifies a different filing date. An application under this section is deemed granted by the Commission on the 31st day after the Commission releases a public notice stating that the application has been accepted for filing, unless the Bureau notifies the applicant that the grant will not be automatically effective.

(e) ***Non-streamlined processing of applications.*** If an application discloses that the applicant has reportable ownership by a foreign person or entity, the Bureau shall remove the application from streamlined processing. The Bureau may also remove an application from streamlined processing at its discretion for other reasons. The Bureau shall notify the applicant by public notice that it is removing the application from streamlined processing, and shall state the reason for the removal. An application may also receive non-streamlined processing if:

(1) An applicant fails to respond promptly to Commission inquiries;

(2) An application is associated with a non-routine request for waiver of the Commission's rules in this chapter;

(3) An application would, on its face, violate a Commission rule in this chapter or the Communications Act;

(4) Timely filed comments on the application raise public interest concerns that require further Commission review; or

(5) The Bureau determines that the application requires further analysis to determine whether granting the application serves the public interest.

(f) ***Additional information.*** Applicants must provide additional information requested by the Bureau during and after its initial review of a direct access application. Failure to respond to such a request or other official correspondence may result in the rejection of the application without prejudice. Any additional information that the Bureau may require must be submitted in the same manner as the original application filing, unless the Bureau specifies another method.

(g) ***Rejection of applications.*** The Bureau may reject an application by announcing the rejection, the reasons for the rejection, and whether the rejection is with or without prejudice via public notice if it determines or has a reasonable basis to believe that:

(1) The applicant cannot satisfy the qualification requirements for a Commission authorization under this section;

(2) The applicant has made a false statement or certification to the Commission;

(3) The applicant has engaged in behavior contrary to the public interest; or

(4) Granting the application would not serve the public interest.

(h) ***Authorization suspension.*** The Wireline Competition Bureau or Enforcement Bureau may suspend or deny a direct access authorization holder's access to new numbering resources under 5 U.S.C. 558(c):

(1) After either Bureau determines that the authorization holder acted willfully; or public health, interest, or safety requires an immediate suspension; or

(2) After giving the authorization holder notice and an opportunity to demonstrate compliance with the Commission's rules in this chapter.

(i) ***Authorization revocation.*** The Wireline Competition Bureau or Enforcement Bureau shall determine appropriate procedures and initiate revocation and/or termination proceedings and revoke and/or terminate an authorization, as required by due process and applicable law and in light of the relevant facts and circumstances, including providing the authorization holder with notice and opportunity to respond. Either Bureau may commence such revocation and/or termination proceedings if:

(1) The authorization holder has failed to comply with the Commission's numbering rules in this part.

(2) The authorization holder no longer meets the requirements for a Commission authorization under this section;

(3) The authorization holder, or officer or authorized representative of the authorization holder, has made a false statement or certification to the Commission; or

(4) Revoking and/or terminating the authorization is in the public interest.

(j) ***Conditions applicable to all interconnected VoIP provider numbering authorizations.*** An interconnected VoIP provider authorized to request numbering resources directly from the Numbering Administrators under this section shall:

(1) Maintain the accuracy of all contact information, certifications, and ownership or affiliation information in its application. If any contact information, certification, or affiliation information submitted in an application pursuant to this section, is no longer accurate, the provider must file a correction with the Commission and each applicable state within thirty (30) days of the change of contact information, certification, or affiliation information. Regarding ownership information, if the holders of equity and/or voting interests in the provider change such that a provider that previously did not have reportable ownership or control information under paragraph (b)(12) of this section now has reportable ownership or control information, or there is a change to the reportable ownership or control information the provider previously reported under paragraph (b)(12), the provider must file a correction with the Commission and each applicable state within thirty (30) days of the change to its ownership or control information. The Commission may use the updated contact information, certifications, or ownership or affiliation information to determine whether a change in authorization status is warranted;

(2) Comply with the applicable Commission numbering rules in this part; numbering authority delegated to the states; and industry guidelines and practices regarding numbering as applicable to telecommunications carriers;

(3) File requests for numbers with the relevant state commission(s) at least thirty (30) days before requesting numbers from the Numbering Administrators;

(4) Provide accurate regulatory and numbering contact information to each state commission when requesting numbers in that state;

(5) File updated certifications and ownership and control disclosures under paragraphs (b)(2) through (6), (9), (11), (12), and (18) of this section if the authorization obtained under this section was granted before August 8, 2024; and

(6) File updated certifications under paragraphs (14), (15), (16) of this section if the holder of the authorization obtained under this section did not submit the referenced certifications with the initial application filing.

(7) Paragraph (j)(5) of this section contains a new information-collection requirement. Compliance with paragraph (j)(5) will not be required until this paragraph (j)(7) is removed or contains a compliance date.

(8) Paragraph (j)(6) of this section contains a new information-collection requirement. Compliance with paragraph (j)(6) will not be required until this paragraph (j)(8) is removed or contains a compliance date.

APPENDIX B

Proposed Rules

The Federal Communications Commission amends part 52 of Title 47 of the Code of Federal Regulations as follows:

PART 52 – NUMBERING

1. The authority citation for part 52 is revised to read as follows:

Authority: 47 U.S.C. 151, 152, 153, 154, 155, 201-205, 207-209, 218, 225-227, 227b-1, 251-252, 271, 303, 332, unless otherwise noted.

2. Amend § 52.18 by revising paragraph (e) to read as follows:

(e) Non-streamlined processing of applications. If an application discloses that the applicant has reportable ownership by a foreign person or entity, the Bureau shall remove the application from streamlined processing. The Bureau may also designate an application for non-streamlined processing at its discretion for other reasons. An application may also receive non-streamlined processing if:

(i) An applicant fails to respond promptly to Commission inquiries;

(ii) An application is associated with a non-routine request for waiver of the Commission's rules in this chapter;

(iii) An application would, on its face, violate a Commission rule in this chapter or the Communications Act;

(iv) Timely filed comments on the application raise public interest concerns that require further Commission review; or

(v) The Bureau determines that the application requires further analysis to determine whether granting the application serves the public interest.

Should the Bureau determine that a complete application requires a more detailed public interest review, it will assign a docket number to the application and issue a public notice stating that the application has been accepted for filing as a non-streamlined application, which will not be deemed granted until further action by the Bureau or Commission. The Bureau shall notify the applicant by public notice that it is designating the application for non-streamlined processing, and shall state the reason for the designation.

3. Amend § 52.18 by revising paragraph (g) to read as follows:

(g) Rejection of applications. The Bureau may reject an application without seeking comment by announcing the rejection, the reasons for the rejection, and whether the rejection is with or without prejudice via public notice if it determines or has a reasonable basis to believe that:

(i) The applicant cannot satisfy the qualification requirements for a Commission authorization under this paragraph (c);

(ii) The applicant has made a false statement or certification to the Commission;

(iii) The applicant has engaged in behavior contrary to the public interest;

(iv) A disclosure of Foreign Adversary control as defined in 47 CFR § 1.70001(e); or

(v) Granting the application would not serve the public interest.

APPENDIX C

Final Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[1] the Federal Communications Commission (Commission) incorporated an Initial Regulatory Flexibility Analysis (IRFA) in the *Numbering Policies for Modern Communications, et al*., *Third Further Notice of Proposed Rulemaking* (*Third VoIP Direct Access Further Notice*) released in December 2025.[2] The Commission sought written public comment on the proposals in the *Third VoIP Direct Access Further Notice*, including comment on the IFRA. No comments were filed addressing the IRFA. This Final Regulatory Flexibility Analysis (FRFA) conforms to the RFA and it (or summaries thereof) will be published in the Federal Register.[3]

A. Need for, and Objectives of, the Rules

2. The *Fourth Report and Order* takes important steps aimed at protecting the nation's numbering resources from abuse by foreign bad actors by strategically updating the Commission's rules regarding how interconnected Voice over Internet Protocol (VoIP) providers obtain authorization for direct access to our nation's limited numbering resources.

3. The *Fourth Report and Order* requires both new applicants and existing authorization holders to make certifications regarding the Commission's Covered List and section 214 authorization revocations and allow for the suspension of a VoIP numbering authorization if necessary to protect the public interest. The *Fourth Report and Order* also amends 47 CFR § 52.15(g)(3), to streamline review and management of the VoIP numbering authorization process.[4] Specifically, the *Fourth Report and Order* requires new applicants to submit with their applications a list of states where they initially intend to request numbering resources.[5] The *Fourth Report and Order* also clarifies that the delegated authority to the Wireline Competition Bureau (Bureau) permits the Bureau to direct the NANPA, via public notice, to deny pending and future numbering resource requests if an authorization holder submits reported information that warrants additional investigation or requires a referral to the Executive Branch agencies for a national security review.[6]

B. Summary of Significant Issues Raised by Public Comments in Response to the IRFA

4. No comments were filed addressing the impact of the proposed rules on small entities.

C. Response to Comments by the Chief Counsel for the Small Business Administration Office of Advocacy

5. Pursuant to the Small Business Jobs Act of 2010, which amended the RFA,[7] the Commission is required to respond to any comments filed by the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy, and also provide a detailed statement of any change made to

[1] 5 U.S.C. § 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[2] *Numbering Policies for Modern Communications et al.*, WC Docket Nos. 13-97 at al., Third Report and Order and Third Further Notice of Proposed Rulemaking, 40 FCC Rcd 10481, 10483, para. 5 (2025) (*Third VoIP Direct Access Order and Further Notice*).

[3] 5 U.S.C. § 604.

[4] *See Fourth Report and Order* Part III.B

[5] *Id.*

[6] *Id*.

[7] Small Business Jobs Act of 2010, Pub. L. No. 111-240, 124 Stat. 2504 (2010).

the proposed rules as a result of those comments.[8] The Chief Counsel did not file any comments in response to the proposed rules in this proceeding.

D. Description and Estimate of the Number of Small Entities to Which the Rules Will Apply

6. The RFA directs agencies to provide a description of, and where feasible, an estimate of the number of small entities that may be affected by the adopted rules.[9] The RFA generally defines the term "small entity" as having the same meaning as the terms "small business," "small organization," and "small governmental jurisdiction."[10] In addition, the term "small business" has the same meaning as the term "small business concern" under the Small Business Act (SBA).[11] A "small business concern" is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.[12] The SBA establishes small business size standards that agencies are required to use when promulgating regulations relating to small businesses; agencies may establish alternative size standards for use in such programs, but must consult and obtain approval from SBA before doing so.[13]

7. Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.[14] In general, a small business is an independent business having fewer than 500 employees.[15] These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.[16] Next, "small organizations" are not-for-profit enterprises that are independently owned and operated and are not dominant in their field.[17] While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.[18] Finally, "small governmental jurisdictions" are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.[19] Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local

[8] 5 U.S.C. § 604 (a)(3).

[9] *Id*. § 604.

[10] *Id*. § 601(6).

[11] *Id*. § 601(3) (incorporating by reference the definition of "small-business concern" in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies "unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register."

[12] 15 U.S.C. § 632.

[13] 13 CFR § 121.903.

[14] 5 U.S.C. § 601(3)-(6).

[15] *See* SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

[16] *Id.*

[17] 5 U.S.C. § 601(4).

[18] *See* SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 25, 2019), https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/.

[19] 5 U.S.C. § 601(5).

government jurisdictions have a population of less than 50,000.[20]

8. The rules adopted in the *Fourth Report and Order* will apply to small entities in the industries identified in the chart below by their six-digit North American Industry Classification System (NAICS)[21] codes and corresponding SBA size standard.[22] Where available, we also provide additional information regarding the number of potentially affected entities in the identified industries below.

Table 1. 2022 U.S. Census Bureau Data by NAICS Code

Regulated Industry (Footnotes specify potentially affected entities within a regulated industry where applicable)	NAICS Code	SBA Size Standard	Total Firms[23]	Total Small Firms[24]	% Small Firms
Wired Telecommunications Carriers[25]	517111	1,500 employees	3,403	3,027	88.95%
Wireless Telecommunications Carriers (except Satellite)	517112	1,500 employees	1,184	1,081	91.30%
Telecommunications Resellers[26]	517121	1,500 employees	955	847	88.69%
Satellite Telecommunications	517410	$44 million	332	195	58.73%
All Other Telecommunications	517810	$40 million	1,673	1,007	60.19%

[20] *See* U.S. Census Bureau, 2022 Census of Governments –Organization, https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html, tables 1-11.

[21] The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. *See* www.census.gov/NAICS for further details regarding the NAICS codes identified in this chart.

[22] The size standards in this chart are set forth in 13 CFR § 121.201, by six-digit NAICS code.

[23] *U.S. Census Bureau*, "*Selected Sectors: Employment Size of Firms for the U.S.: 2022*." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEEMPFIRM, 2025, and "*Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2022*." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEREVFIRM, 2025.

[24] *Id.*

[25] Affected Entities in this industry include Cable System Operators (Telecom Act Standard), Competitive Local Exchange Carriers (CLECs), Incumbent Local Exchange Carriers (Incumbent LECs), Interexchange Carriers (IXCs), Local Exchange Carriers (LECs), and Other Toll Carriers.

[26] Affected Entities in this industry include Local Resellers, Prepaid Calling Card Providers, and Toll Resellers.

Table 2. Telecommunications Service Provider Data

2025 Universal Service Monitoring Report Telecommunications Service Provider Data [27] **(Data as of December 2024)**	**SBA Size Standard (1500 Employees)**		
Affected Entity	**Total # FCC Form 499A Filers**	**Small Firms**	**% Small Entities**
Cable/Coax CLEC	69	63	91.30
Competitive Local Exchange Carriers (CLECs)[28]	4,049	3,853	95.16
Incumbent Local Exchange Carriers (Incumbent LECs)	1,175	920	78.30
Interexchange Carriers (IXCs)	112	92	82.14
Local Exchange Carriers (LECs)[29]	5,224	4,773	91.37
Local Resellers	253	242	95.65
Other Toll Carriers	72	69	95.83
Prepaid Card Providers	47	45	95.74
Toll Resellers	402	388	96.52
Wired Telecommunications Carriers[30]	4,971	4,531	91.15
Wireless Telecommunications Carriers (except Satellite)[31]	608	522	85.86

E. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

9. The RFA directs agencies to describe the economic impact of adopted rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an

[27] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 25, Table 1.12 (2025), https://docs.fcc.gov/public/attachments/DOC-418505A1.pdf.

[28] Affected Entities in this industry include all reporting local competitive service providers.

[29] Affected Entities in this industry include all reporting fixed local service providers (CLECs & ILECs).

[30] Local Resellers fall into another U.S. Census Bureau industry (Telecommunications Resellers) and therefore data for these providers is not included in this industry.

[31] Affected Entities in this industry include all reporting wireless carriers and service providers.

estimate of the classes of small entities which will be subject to the requirement and the type of professional skills necessary for preparation of the report or record.[32]

10. In the *Fourth Report and Order*, we adopt new certification and disclosure requirements for interconnected VoIP providers that are either new applicants or existing authorization holders for the direct access numbering authorization from the Commission. Specifically, we require new applicants and existing direct access authorization holders, some of which are small entities, to make national-security-focused certifications concerning the Commission's Covered List, "covered" equipment, and section 214 authorization revocations. Direct access authorization holders must certify that they are not entities whose equipment and/or services are identified on the FCC's Covered List (or affiliates or subsidiaries of such an entity), that they do not have "covered" equipment and/or services in their network, and that they are not, and have not been, subject to the denial or revocation of an international and/or domestic section 214 authorization based on national security or law enforcement grounds. The *Fourth Report and Order* also requires new applicants to submit with their filing a list of states where they will initially provide service. All new applicants and authorization holders will continue filing applications and updates to the Electronic Comment Filing System (ECFS).

11. After reviewing the record, we received no concerns about unique burdens from small businesses that would be impacted by the new certifications adopted in the *Fourth Report and Order*. The Commission anticipates the approaches it has taken to implement the new requirements will have minimal or de minimis cost implications because many of these obligations are required to comply with existing Commission regulations and consist of straightforward attestations. As such, it is unlikely that small entities will be required to hire professionals to comply with these requirements. Any costs imposed on small or other applicants and authorization holders are minimal and reasonable, given the important national security objectives of these rules.

F. Discussion of Steps Taken to Minimize the Significant Economic Impact on Small Entities, and Significant Alternatives Considered

12. The RFA requires an agency to provide, "a description of the steps the agency has taken to minimize the significant economic impact on small entities . . . including a statement of the factual, policy, and legal reasons for selecting the alternative adopted in the final rule and why each one of the other significant alternatives to the rule considered by the agency which affect the impact on small entities was rejected."[33]

13. The *Fourth Report and Order* considered alternatives that may reduce the impact of these rule changes on small entities. New certification obligations regarding the Commission's Covered List, "covered" equipment, and section 214 revocation for interconnected VoIP providers were streamlined to straightforward attestations and may be submitted with the application or as a post-grant filing via the Commission's ECFS in order to reduce confusion and burden on applicants and existing authorization holders. Existing authorization holders will submit these new certifications and all filings in an administrative docket and an inbox for confidential filings, DAA@fcc.gov.[34] A direct access authorization holder that cannot provide the required certifications may provide with their application a detailed explanation of the relationship between the applicant and any entity on the FCC's Covered List and/or an accounting of any covered equipment used in the applicant's networks.

14. While some commenters believe new requirements are burdensome and unnecessary,[35] as

[32] 5 U.S.C. § 604(a)(5).

[33] *Id*. § 604(a)(6).

[34] Currently, authorization holders submit updates to their filing to INBOX-52.15 (x). Once the rule reorganization we adopt here becomes effective, authorization holders will submit updates to INBOX-52.18 (j).

[35] *See e.*g., VON Comments at 3.

discussed above, the new certification requirements in the *Fourth Report and Order* require providers to certify that they do not have equipment and/or services that are identified on the Commission's Covered List (or that they are not affiliates or subsidiaries of such an entity), that they do not have "covered" equipment and/or services in their network, and that they are not, or have not been, subject to a section 214 revocation. These straightforward attestations are designed to be minimally burdensome and will further important public interest and national security objectives. The list of states of initial service disclosure requirement for new applicants is a formalization of an existing practice that many applicants comply with voluntarily and should be readily available to the impacted providers as a standard business recordkeeping practice. For these reasons, we believe that small and other interconnected VoIP providers will not face significantly increased compliance burdens when including these new certifications and disclosures in their direct access authorization applications or in compliance with post-grant reporting requirements.

G. Report to Congress

15. The Commission will send a copy of the *Fourth Report and Order*, including this Final Regulatory Flexibility Analysis, in a report to Congress pursuant to the Congressional Review Act.[36] In addition, the Commission will send a copy of the *Fourth Report and Order*, including this Final Regulatory Flexibility Analysis, to the Chief Counsel for the SBA Office of Advocacy and will publish a copy of the *Fourth Report and Order* and this Final Regulatory Flexibility Analysis (or summaries thereof) in the Federal Register.[37]

[36] 5 U.S.C. § 801(a)(1)(A).

[37] *Id*. § 604(b).

APPENDIX D

Initial Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[1] the Federal Communications Commission (Commission) has prepared this Initial Regulatory Flexibility Analysis (IRFA) of the policies and rules proposed in the *Fourth Further Notice of Proposed Rulemaking* (*Fourth Further Notice)* assessing the possible significant economic impact on a substantial number of small entities. The Commission requests written public comments on this IRFA. Comments must be identified as responses to the IRFA and must be filed by the deadlines for comments specified on the first page of the *Fourth Further Notice*. The Commission will send a copy of the *Fourth Further Notice*, including this IRFA, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.[2] In addition, the *Fourth Further Notice* and IRFA (or summaries thereof) will be published in the Federal Register.[3]

A. Need for, and Objectives of, the Proposed Rules

2. In the *Fourth Further Notice*, the Commission continues to strengthen our direct access rules to protect consumers and our nation's finite numbering resources. As bad actors, both foreign and domestic, continue to seek new and creative methods for exploiting consumers and causing harm, we must continue to bolster our safeguards against those who pose unacceptable national security risks. We seek comment on ways we can continue to leverage our direct access rules to enhance our review and vetting process for new applicants, further streamline our management of the authorization process, and increase transparency into the entities obtaining access to numbers. Specifically, we first seek comment on adopting a presumptive disqualifying condition for applicants and authorization holders with equipment and/or services identified on the Covered List (or that are affiliates or subsidiaries of such an entity), or that have "covered" equipment and/or services in their networks. Second, we seek comment on measures to protect U.S. telecommunications networks against foreign adversaries, foreign-adversary controlled equipment and/or service, and other cybersecurity and physical security risks. Third, we seek comment on a series of rule revisions designed to increase transparency into entities applying for and receiving a VoIP numbering authorization, including disclosures of updated ownership information, business model narrative, and affiliate entity and numbering use disclosure requirements for new applicants. We also seek comment on enhanced physical address disclosures for both new applicants and existing authorization holders. Fourth, we seek comment on a proposal that the Wireline Competition Bureau (Bureau) will release a public notice indicating the conclusion of its review of any post-grant reporting of ownership and transfer of control changes by an authorization holder. Fifth, we propose rule revisions for continued streamlined review and management of the VoIP numbering authorization process. Finally, we seek comment on additional measures to further strengthen our rules and protect numbering resources, such as requiring authorization holders to periodically update facilities readiness documentation, standardizing the facilities readiness documentation for new applicants, specifying which positions and documentation will satisfy the key managerial and technical personnel requirement for new applicants, recertification timelines for the proposed measures, and whether we should implement a term limit for the VoIP numbering authorization.[4]

B. Legal Basis

3. The proposed action is authorized pursuant to sections 1, 3, 4, 201-205, 251, and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 153, 154, 201-205, 251, 303(r), and

[1] 5 U.S.C. § 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[2] *Id*. § 603(a).

[3] *Id.*

[4] *See* 47 CFR § 52.18(b)(8), (b)(11).

section 6(a) of the TRACED Act, Pub. L. No. 116-105, § 6(a)(1)-(2), 133 Stat. 3274, 3277 (2019), 47 U.S.C. § 227b-1.

C. Description and Estimate of the Number of Small Entities to Which the Proposed Rules Will Apply

5. The RFA directs agencies to provide a description of and, where feasible, an estimate of the number of small entities that may be affected by the proposed rules, if adopted.[5] The RFA generally defines the term "small entity" as having the same meaning as the terms "small business," "small organization," and "small governmental jurisdiction."[6] In addition, the term "small business" has the same meaning as the term "small business concern" under the Small Business Act (SBA).[7] A "small business concern" is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.[8] The SBA establishes small business size standards that agencies are required to use when promulgating regulations relating to small businesses; agencies may establish alternative size standards for use in such programs, but must consult and obtain approval from SBA before doing so.[9]

6. Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.[10] In general, a small business is an independent business having fewer than 500 employees.[11] These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.[12] Next, "small organizations" are not-for-profit enterprises that are independently owned and operated and not dominant their field.[13] While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.[14] Finally, "small governmental jurisdictions" are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.[15] Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local government jurisdictions have a population of less than 50,000.[16]

---

[5] 5 U.S.C. § 603(b)(3).

[6] *Id*. § 601(6).

[7] *Id*. § 601(3) (incorporating by reference the definition of "small-business concern" in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies "unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register."

[8] 15 U.S.C. § 632.

[9] 13 CFR § 121.903.

[10] 5 U.S.C. § 601(3)-(6).

[11] *See* SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

[12] *Id*.

[13] 5 U.S.C. § 601(4).

[14] *See* SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 25, 2019), https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/.

[15] 5 U.S.C. § 601(5).

[16] *See* U.S. Census Bureau, 2022 Census of Governments –Organization, https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html, tables 1-11.

7. The rules proposed in the *Fourth Further Notice* will apply to small entities in the industries identified in the chart below by their six-digit North American Industry Classification System (NAICS)[17] codes and corresponding SBA size standard.[18] Where available, we also provide additional information regarding the number of potentially affected entities in the industries identified below.

Table 1. 2022 U.S. Census Bureau Data by NAICS Code

Regulated Industry (Footnotes specify potentially affected entities within a regulated industry where applicable)	NAICS Code	SBA Size Standard	Total Firms[19]	Total Small Firms[20]	% Small Firms
Wired Telecommunications Carriers[21]	517111	1,500 employees	3,403	3,027	88.95%
Wireless Telecommunications Carriers (except Satellite)	517112	1,500 employees	1,184	1,081	91.30%
Telecommunications Resellers[22]	517121	1,500 employees	955	847	88.69%
Satellite Telecommunications	517410	$44 million	332	195	58.73%
All Other Telecommunications	517810	$40 million	1,673	1,007	60.19%

[17] The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. *See* www.census.gov/NAICS for further details regarding the NAICS codes identified in this chart.

[18] The size standards in this chart are set forth in 13 CFR § 121.201, by six digit North American Industrial Classification System (NAICS) code.

[19] *U.S. Census Bureau*, "*Selected Sectors: Employment Size of Firms for the U.S.: 2022*." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEEMPFIRM, 2025, *and* "*Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2022*." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEREVFIRM, 2025.

[20] *Id.*

[21] Affected Entities in this industry include Cable System Operators (Telecom Act Standard), Competitive Local Exchange Carriers (CLECs), Competitive Local Service Providers, Incumbent Local Exchange Carriers (Incumbent LECs), Interexchange Carriers (IXCs), Local Exchange Carriers (LECs), and Other Toll Carriers.

[22] Affected Entities in this industry include Local Resellers, Prepaid Calling Card Providers, and Toll Resellers.

Table 2. Telecommunications Service Provider Data

2025 Universal Service Monitoring Report Telecommunications Service Provider Data [23] (Data as of December 2024)	SBA Size Standard (1500 Employees)		
Affected Entity	**Total # FCC Form 499A Filers**	**Small Firms**	**% Small Entities**
Cable/Coax CLEC	69	63	91.30
Competitive Local Exchange Carriers (CLECs)[24]	4,049	3,853	95.16
Incumbent Local Exchange Carriers (Incumbent LECs)	1,175	920	78.30
Interexchange Carriers (IXCs)	112	92	82.14
Local Exchange Carriers (LECs)[25]	5,224	4,773	91.37
Local Resellers	253	242	95.65
Other Toll Carriers	72	69	95.83
Prepaid Card Providers	47	45	95.74
Toll Resellers	402	388	96.52
Wired Telecommunications Carriers[26]	4,971	4,531	91.15
Wireless Telecommunications Carriers (except Satellite)[27]	608	522	85.86

D. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

8. The RFA directs agencies to describe the economic impact of proposed rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an

[23] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 25, Table 1.12 (2025), https://docs.fcc.gov/public/attachments/DOC-418505A1.pdf.

[24] Affected Entities in this industry include all reporting local competitive service providers.

[25] Affected Entities in this industry include all reporting fixed local service providers (CLECs & ILECs).

[26] Local Resellers fall into another U.S. Census Bureau industry (Telecommunications Resellers) and therefore data for these providers is not included in this industry.

[27] Affected Entities in this industry include all reporting wireless carriers and service providers.

estimate of the classes of small entities which will be subject to the requirements and the type of professional skills necessary for preparation of the report or record.[28]

9. In the *Fourth Further Notice*, the Commission seeks comment on proposals that, if adopted, will affect all interconnected VoIP providers seeking a VoIP numbering authorization with the Commission, including those that may be small entities. As detailed in section A, we seek comment on presumptive disqualifying conditions, protections against foreign adversaries, foreign-adversary controlled equipment and/or service, and other cybersecurity and physical security risks, additional disclosure requirements with respect to corporate history and physical address, as well as streamlined documentation production for facilities readiness and key managerial and technical personnel requirements. These proposals may create new or additional reporting, recordkeeping, and/or other compliance obligations on small entities, if adopted. Much of this information may be collected by small and other entities due to existing compliance obligations or as part of normal business practices. We anticipate the information we receive in comments including, where requested, cost and benefit analyses, will help the Commission further identify and evaluate relevant compliance matters for small entities, including compliance costs, such as whether small entities will have to hire professionals, and other burdens that may result from the inquiries we make in the *Fourth Further Notice*.

E. Discussion of Significant Alternatives Considered That Minimize the Significant Economic Impact on Small Entities

10. The RFA directs agencies to provide a description of any significant alternatives to the proposed rules that would accomplish the stated objectives of applicable statutes, and minimize any significant economic impact on small entities.[29] The discussion is required to include alternatives such as: "(1) the establishment of differing compliance or reporting requirements or timetables that take into account the resources available to small entities; (2) the clarification, consolidation, or simplification of compliance and reporting requirements under the rule for such small entities; (3) the use of performance rather than design standards; and (4) an exemption from coverage of the rule, or any part thereof, for such small entities."[30]

11. In the *Fourth Further Notice*, the Commission continues to strengthen its direct access rules to protect consumers and our nation's finite numbering resources from bad actors seeking to exploit our rules or pose unacceptable national security threats. While doing so, the Commission seeks comment on a number of proposals related to the VoIP numbering authorization. These include questions to help us evaluate potential burdens for impacted providers, particularly for small entities, so that we can also evaluate alternative approaches. For example, we consider whether to define the types of leadership changes that should be included in the proposed corporate history disclosure, such as roles with a voting interest, and whether this should cover more or less than the previous five years. We also seek comment on whether to require additional documentation for the physical address requirements for small and other businesses that operate from a residential location, and whether additional documentation should be required for providers to demonstrate facilities readiness, managerial, and technical expertise.

12. In evaluating the proposals in the *Fourth Further Notice*, the Commission will fully consider the economic impact on small entities as it evaluates the comments filed, including comments related to costs and benefits. Alternative proposals and approaches from commenters will further develop the record and could help the Commission further minimize the economic impact on small entities. The Commission's evaluation of the comments filed in this proceeding will shape the final conclusions it reaches, the final alternatives it considers, and the actions it ultimately takes to minimize any significant economic impact that may occur on small entities from the final rules.

[28] 5 U.S.C. § 603(b)(4).

[29] *Id.* § 603(c).

[30] *Id.* § 603(c)(1)-(4).

F. Federal Rules that May Duplicate, Overlap, or Conflict with the Proposed Rules

13. None.