

State of California

Public Utilities Commission
San Francisco

M E M O R A N D U M

Date: September 26, 2025

To: The Commission
(Meeting of October 9, 2025)

From: Jonathan Koltz
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Subject: Ratification of Off-Agenda Approval to File Comments, Federal Communications Commission Extension of Information Collection, OMB Control No. 3060-1005

RECOMMENDATION: On September 18, 2025, the Litigation Subcommittee gave staff off-agenda authority to file the attached comments responding to the Federal Communications Commission’s (FCC) notice and request for comments regarding information collection on Numbering Resource Optimization.¹ On September 25, staff filed comments supporting the extension of currently-approved information collection processes regarding the “safety valve” and specialized overlay delegation authority. Staff also asked clarifying questions about the implementation of specialized overlays. Staff now recommends that the Commission ratify the authority granted by the Litigation Subcommittee.

BACKGROUND: The FCC has jurisdiction over telephone numbering plans in the United States and adopts rules governing numbering resources. The FCC has delegated specific authority to state regulatory agencies to conduct area code relief and to enforce number conservation. The CPUC exercises this delegated authority in California.

On August 26, 2025, the FCC issued a notice seeking comments from the public and federal agencies on its information collection request² submitted for review and approval

¹ [Federal Register Doc. 2025–16287](#)

² To fulfill its responsibilities under the law, the FCC must often ask its applicants or licensees to fill out forms, maintain records, or disclose information to others. These are known as information collections. The Paperwork Reduction Act (44 U.S.C. Part 35) requires the FCC to

to the Office of Management and Budget (OMB). FCC's request to OMB is to extend its existing information collection for the Numbering Resource Optimization – Phase 3 program (OMB Control No. 3060-1005). The purpose of the requested information is to help the FCC and state commissions better manage phone numbering resources. The particular information sought touches on two programs that the CPUC implements under its delegated authority: one, the “safety valve,” ensures that telecommunications carriers can meet customer demand in growing markets; the second, specialized overlays, helps to relieve numbering exhaustion.

Safety Valve: Ordinarily, if a carrier receives a request for a block of numbers, it will try to fill the request through its existing inventory. If it cannot do so, it will ask the North American Numbering Plan Administrator for additional numbers. If NANPA refuses to grant the carrier additional numbers, the carrier can make a safety valve request to the appropriate state commission, showing both that it has a need for the numbers and that NANPA denied its request.

Specialized Overlays: Specialized overlays are service- or technology-specific numbering overlays. These differ from ordinary numbering overlays, in which a geographic area facing numbering exhaustion is assigned an additional area code laid over the existing one (for example, 415/628 in San Francisco, or 213/323 in LA), in that ordinary overlays are service- and technology-neutral (for example, the 628 overlay can serve wireline, wireless, and pager numbers). A specialized overlay serves only one type of service, or one type of technology.³ For example, the 917 area code in New York City originally served only cellphones and pagers.

DISCUSSION: The attached comments support the FCC's proposed extension of the current information collection processes. The continuation of both the safety valve mechanism and specialized overlays is essential to ensure that the CPUC can respond rapidly to potential exhaustion of numbering resources in regions with high numbering demand due to growth.

get approval for their information collections from the Office of Management and Budget (OMB). The FCC obtains separate approvals from OMB for each of their information collections.

³ In a service-specific overlay, numbering resources are assigned to carriers that provide a particular type of service or services, such as unified messaging and/or vehicle response (e.g., OnStar) services. In contrast, numbering resources in a technology-specific overlay are assigned to carriers that use a particular type of technology or technologies, such as wireless.

Safety Valve Requests

The comments encourage the FCC to maintain its flexibility by allowing states facing imminent area code depletion the option to grant relief via the safety valve mechanism. By maintaining the information collection framework via this procedural extension, the FCC will continue to process and authorize state-level actions, allowing for more flexibility in states wishing to intervene early during numbering exhaustion.

Specialized Overlays

The comments asked the FCC to issue a public bulletin or technical guidance clarifying common reasons for denying specialized overlays, available methods of alternative relief, acceptable specialized overlay use cases, service provider documentation standards, and expectations for service providers regarding public education.

Additionally, the comments sought clarity on the following issues: (1) Whether a state can seek approval for a specialized overlay that is technology neutral but covers services that are data-only and do not have a voice component; (2) Whether a state can seek approval to implement a specialized overlay in individual and multiple rate centers, to single and multiple numbering plan areas within the state, and up to the entire state; and (3) Whether a state can request new area codes solely used for implementing a statewide specialized overlay.

CONCLUSION: Staff asks the Commission to ratify the Litigation Subcommittee's authorization to file the attached comments.

ASSIGNED STAFF:

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of:

Notice and request for comments on
extension of a currently approved
information collection process regarding the
safety valve and specialized overlay
delegation authority

OMB Control Number: 3060-1005

**COMMENTS OF THE STATE OF CALIFORNIA
AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION**

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I. INTRODUCTION

On August 26, 2025, the Federal Communications Commission (FCC) issued a notice and request for comment on the Information Collection submitted for review and approval to the Office of Management and Budget.¹ The FCC specifically seeks comment on the extension of a currently-approved information collection process regarding the safety valve and specialized overlay delegation authority.² Recognizing the continuing importance of numbering conservation and granting states the flexibility to ensure market demands are met due to technological advancements, the FCC seeks to extend the existing safety valve and specialized overlay information collection frameworks.

The California Public Utilities Commission (CPUC) supports the FCC's proposed extension of OMB Control No. 3060-1005. The continuation of the safety valve mechanism and specialized overlay via delegated authority is essential to ensure that the CPUC can respond rapidly to potential exhaustion of numbering resources in regions with high numbering demand due to growth.

II. DISCUSSION AND RECOMMENDATIONS

A. Safety Valve Requests

We support and encourage the FCC to maintain its flexibility by allowing states facing imminent area code depletion the option to grant relief via the safety valve mechanism. By maintaining the information collection framework with this

¹ [H.R.327 — 107th Congress \(2001-2002\)](#)

² [Federal Register Doc. 2025-16287](#)

procedural extension, the FCC will continue to process and authorize state-level actions, allowing for more flexibility in states wishing to intervene early during numbering exhaustion.

B. Specialized Overlays

The FCC's allowance for specialized overlays (SOs) is a valuable tool and the extension allows the petition process to function under FCC oversight; however, the current guidance lacks clarity on how such overlays should be justified in state petitions. We request that the FCC issue a public bulletin or technical guidance clarifying common SO denial reasons, available methods of alternative relief, acceptable SO use cases, service provider documentation standards, and expectations for service providers regarding public education.

Additionally, the CPUC seeks clarity on the following issues: (1) whether a state can seek approval for SO that is technology neutral but covers services that are data-only and do not have a voice component, (2) whether a state can seek approval to implement SO in individual and multiple rate centers, to single and multiple numbering plan areas within the state, and up to the entire state, and (3) whether a state can request new area codes solely used for implementing a statewide SO.

III. CONCLUSION

The CPUC supports the FCC's extension of the information collection framework regarding the safety valve and specialized overlay delegation authority. The collection process formalized under OMB 3060-1005 enables structured

coordination between the FCC and state commissions. Numbering relief mechanisms, such as specialized overlays and safety valve mechanisms, help states avoid numbering disruptions in fast growing cities with unexpected numbering demands. The extension will continue the existing process of allowing and providing flexibility for state actions regarding numbering conservation and relief. We appreciate the opportunity to provide input to the FCC.

Respectfully submitted,

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