

FCC RND best practices for government programs

Briefing by TTS/GSA Public Benefits Studio, Sep 22, 2023

Background

The Public Benefits Studio met with seven state programs to learn about how we might help them better serve the public through more accurate text message communication. Among other things, we explored state program interest in the FCC [Reassigned Numbers Database](#) (RND). We wrote this summary of our findings to be published as a resource for government texting programs.

About RND

In speaking with states, we found that there is a lack of knowledge and some misconceptions around RND, including the scale of the problem it solves. The following “frequently asked questions” came up and we had some success helping states better understand this service.

What value does RND provide to programs?

From its own [website](#), “At a time when Telephone Consumer Protection Act (TCPA) fines and penalties are costly – both from a financial AND reputation standpoint – the FCC [Reassigned Numbers Database](#), or RND for short, empowers users to corroborate compliance with regulatory requirements. By querying the RND, numbers that were reassigned from a previous consumer can be immediately identified – thus ensuring your organization is not contacting consumers who have not given permission for the call/text.”

How many numbers are reassigned each year?

According to [this report](#) from the FCC, 35 million wireless/mobile phone numbers are reassigned each year in North America (Page 3, “The Reassigned Number Problem”). Assuming proportional amounts of mobile number reassignments across North America, this would be about 20 million reassignments a year or 1.6 million reassignments a month in the US.

How often are numbers updated?

When a mobile or landline phone number is disconnected, phone carriers are required to report it to the FCC RND on a monthly basis. FCC policy dictates that carriers can reassign a number 45 days after it’s been disconnected, so they are assuming texters will have gotten the 30-day update with RND and stopped texting by the time that happens.

How does your program interact with RND?

Programs query the RND via [web UI, SFTP transfer, API call, or API upload](#) with a phone number, or list of numbers, as well as a “last known contact date”. This date doesn’t have to necessarily be the same date as the date of the prior written express but can be a past date in which it is reasonably certain that the customer the caller intends to reach could in fact be reached at that number. For example, a caller might select the date on which it last spoke to the

customer at that number or the date the customer last updated their contact information. RND then reports back “YES” or “NO” if a given number has been reassigned since that date, as long as the Date of Consent provided in the query is 1/27/21 or later. There is no push of updates. That said, there's no reason to verify all numbers every month if your program is not texting them.

How do programs usually get started?

Most agencies test this service out and most seem to subscribe to “tier 1” with 1,000 queries/month for \$10/month. There is a “sandbox” environment, but it does not have access to production data. You must register to get more information on API development.

Barriers to using FCC RND and solutions

None of the seven programs we spoke with are currently using FCC RND or have immediate plans to start using it. We heard a number of barriers from our conversations and have some suggestions for solutions:

- **Unclear about the scale of the “The Reassigned Number Problem”** - Most programs we spoke with were unaware of the massive amount of phone number reassignments processed through RND and the likelihood they are currently texting numbers that have been reassigned. Some had questions around “what are the demographic patterns of people whose numbers get reassigned” that we were unable to answer. “The Reassigned Number Problem” section on page 3 of [this report](#) has some motivating data that speaks to the scale of this problem. It could be helpful if RND better explained this on their website and also provided more information on demographics of people whose numbers are most frequently disconnected and reassigned.
- **Uncertainty around the date to query RND with** - Many programs were unsure what “last known contact date” meant and how exactly that applied to explicit or implied consent dates. Our recommendation to state programs is to start recording last contact data as well as explicit and implied consent dates. Other dates can be used to query the API as described above.
- **Uncertainty around how RND relates to similar systems** - One program mentioned they didn’t need to use RND as they were already looking at Twilio’s [“Deactivated Phone Numbers” list](#). We recommend the FCC RND better clarify how their system does or does not solve similar problems as these similar sounding systems. The FCC’s Reassigned Numbers Database is a complete and accurate database. It is the comprehensive and authoritative database to which all carriers are mandated to report disconnects to. Only the use of the RND can provide eligibility for safe harbor from TCPA liability.
- **Conflating FCC RND with other kinds of validation** - Many programs are currently validating SMS capabilities of phone numbers using [validation services like Twilio](#) or are

looking into doing so. We recommend state programs clearly communicate with their stakeholders that checking for reassignment is different from other kinds of validation.

Outline of FCC RND Test

Below are steps that agencies could potentially take to determine the value of FCC RND data, which we believe can be quantified as “increase in inaccurate numbers identified” and “reduction in unsubscribe rate” (described below). The test can be executed without having to write any custom code by following the steps below.

1. **Define use case** - We recommend focusing on an upcoming text reminder/campaign to timebox the results of the test.
2. **Identify “last contact date”** - Determine this date from the last time you definitively contacted the recipient or alternatively the date of express or implied consent. In many cases, this will be the date the user submitted a benefit form.
3. **Register for FCC RND** - Information on registering can be found [on their website](#). However, a registrant will need to send an email to support@reassigned.us requesting a registration invite. Sign up for a plan inline with the volume of text messages you need to send. The lowest cost plan is \$10/month.
4. **Define baseline metrics** - To understand the potential impact data augmentation has on your program, please provide:
 - a. **Inaccurate numbers identified** - Determine the average or typical percentage of numbers that come up as inaccurate numbers, which could be determined from “undeliverable” counts from your texting platform.
 - b. **Unsubscribe rate** - Determine the percentage of unsubscribes you typically get from a text message blast of this size.
5. **Generate contact list** - Generate a CSV file of contacts to message including their phone number and “last contact date”.
6. **RND processing** - Upload your contact list to the RND’s web UI (reassigned.us). You will receive an output CSV file from RND explaining which numbers have been permanently disconnected after the date of consent. Record the number of “yes”, “no” and “no data” responses.
7. **Filter contact list** - Filter contacts that received a “yes” response from RND, meaning they have been disconnected and reassigned to another individual since the “last contact date”.
8. **Send messages** - Using your filtered contact list, send the messages via Notify or whichever text messaging tool you are using.

9. **Generate and compare metrics to baseline** - Generate “Inaccurate numbers identified” by adding the number of “yes” responses from RND processing along with “undeliverable” counts from your texting provider, divided by the total numbers of phone numbers on the initial contact list. Compare unsubscribe rate from current blast to last blast. Please let us know what your results are if you run this test!

For more help using the Reassigned Number Database, reach out to the Public Benefits Studio within the GSA's Technology Transformation Services: tts-benefits-studio@gsa.gov