



A NEW KIND OF LAW FIRM

July 3, 2025

PUBLIC VERSION: VIA ECFS

CONFIDENTIAL VERSION: VIA FEDERAL EXPRESS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WC Docket No. 19-99

NumberBarn, LLC Application for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of the Commission's Rules, Notice of *Ex Parte* Presentation

Request for Confidential Treatment

Dear Ms. Dortch:

NumberBarn, LLC ("NumberBarn" or "Applicant"), by its attorneys and pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, hereby requests confidential treatment of its presentation, which was used in an *ex parte* meeting (the "Presentation") among NumberBarn, its counsel and the Commission staff identified in the letter summarizing the *ex parte* meeting. The Presentation, which is attached to the *ex parte* notice being filed concurrently herewith, was provided in support of NumberBarn's above-referenced Application for Authorization to Obtain Numbering Resources (the "Application") on July 2, 2025.

NumberBarn respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. § 0.457 and 0.459, the Commission withhold from public inspection the information redacted from the public version of the Presentation as confidential, because the document contains commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). Specifically, in its Presentation, NumberBarn provided information regarding its contract terms with third parties, identification of third party competitors whose information was obtained through those contractual relationships, and the identities of contracting third parties. Although some of the subject information may be available from NumberBarn's vendors to other third parties contracting with such vendors, such information is not typically available to the general public.

The information for which confidentiality is sought is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. NumberBarn respectfully submits that it would suffer substantial competitive harm if this information

were disclosed. The unredacted Presentation is accordingly marked as "Confidential – Not for Public Inspection."

NumberBarn's *ex parte* notice and Presentation follow this cover letter. Should you have any questions regarding those materials or this request, kindly contact the undersigned.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "A Rule". The signature is fluid and cursive, with a large initial "A" and a stylized "Rule".

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Counsel to NumberBarn, LLC



A NEW KIND OF LAW FIRM

July 3, 2025

VIA ELECTRONIC FILING (Public Version)
VIA FEDERAL EXPRESS (Confidential Version)

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Ex Parte Presentation of NumberBarn, LLC, Application for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 19-19

Secretary Dortch:

On July 2, 2025, Allison Rule, Michael Donahue, and Christine McLaughlin of Marashlian & Donahue, PLLC and Brian Scott and Matthew Veling of NumberBarn, LLC ("NumberBarn" or "the Company") met with the following representatives of the Federal Communications Commission ("FCC"):

- Cara Voth, Deputy Bureau Chief, Wireline Competition Bureau ("WCB")
- Jodie May, Division Chief, Competition Policy Division ("CPD"), WCB
- Ed Krachmer, Deputy Chief, CPD/WCB
- Michelle Sclater, Senior Counsel Number Administration, CPD/WCB
- Christi Shewman, Special Counsel, CPD/WCB
- Jordan Reth, Attorney Advisor, CPD/WCB

During the meeting, Mr. Scott led a presentation in which he provided information regarding the Company's history, its marketplace search tool, its role in provisioning toll-free numbers and local telephone numbers to its customers, and its voice services. Mr. Scott explained that the Company is seeking direct access to numbering resources in order to directly participate in the local number portability ("LNP") system, to operate on a level playing field with its competitors, and to improve efficiency, visibility, and reduce costs of providing voice services to its customers.

In his presentation, Mr. Scott provided information demonstrating that NumberBarn does not warehouse or hoard numbers and that its services do not contribute to numbering exhaust. To the contrary, NumberBarn's marketplace search tool provides visibility into the thousands of available numbers that would otherwise remain unused or inaccessible to consumers.

Mr. Scott explained how NumberBarn's marketplace search tool operates and the process the Company undertakes to assign numbers to its customers. Mr. Scott demonstrated that

NumberBarn's services are no different from the service offered by other providers, including those that have been granted direct access to numbering resources. In addition, Mr. Scott provided FCC representatives an overview of the Company's voice offerings, the typical use cases for the Company's voice services, and the interplay of those services and its provisioning of toll-free and local telephone numbers to customers. Mr. Scott also addressed the services offered through NumberBarn's d/b/a, NumberGarage. Under separate cover, NumberBarn is requesting confidential treatment of various information in its presentation. A redacted copy of NumberBarn's presentation is attached hereto and uploaded in the above-referenced Docket; the unredacted copy will be submitted with the concurrently-filed Request for Confidential Treatment.

During the meeting, counsel for NumberBarn reiterated the Company's concern regarding the comments that were filed by the National Association of Regulatory Utility Commissioners ("NARUC") and its members in the above-captioned proceeding. Specifically, Ms. Rule emphasized that concerns regarding number exhaust and utilization are industry-wide issues that are appropriately addressed through the rulemaking process and cannot and should not be addressed through review of a single application. In addition, Ms. Rule noted that neither NARUC nor its members contacted NumberBarn prior to filing comments in this proceeding and that any purported investigations by these entities were done without notice to or input from NumberBarn. As a result, the comments filed by NARUC and its members in this proceeding relied on speculative arguments, misstatements of fact, and an erroneous understanding of NumberBarn, its services, and its role in the marketplace.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Allison D. Rule
Outside Counsel to NumberBarn, LLC

Attachment

Cc: Commission Meeting Attendees (via email)

numberbar

Introduction

Introduction

NumberBarn is registered with the FCC as an Interconnected VOIP provider.

It has been providing voice services through its brands, NumberBarn and NumberGarage, for over 10 years to hundreds of thousands of customers.

As part of its services, it also provides customers with local DIDs and toll-free numbers (“TFNs”).

Introduction

NumberBarn markets its service using "vanity number" and "choose your own number" language.

Its "50MM+ numbers" tagline and the use of the word "buy a number" are used to differentiate its "virtual phone line" or "second line" services in a crowded market.

Specifically, NumberBarn's search engine aggregates the availability of millions of **available**, **unassigned** telephone numbers across many carriers.

NumberBarn's system constantly learns about unused telephone numbers from dozens of sources and provides the world's most comprehensive database of available telephone numbers.

Introduction

NumberBarn does not own phone numbers.

NumberBarn does not warehouse or hoard numbers. The vast majority (95%+) of the quoted 50MM available numbers are available on a first-come first-served (“FCFS”) basis through various wholesale carriers.

NumberBarn does not contribute to numbering exhaust.

On the contrary, NumberBarn provides visibility into available numbers that would otherwise be sitting unused or inaccessible to retail consumers, and it shines a light on long-standing industry practices within the vanity telephone number market.

Introduction

“Choose your number” and “vanity number search” are commonplace in the industry. **NumberBarn is not unique in this regard:**

800.com, **8x8***, **Bandwidth.com***, BulkVS, Burner, CallHippo, DingTone, **FlowRoute***, **Fractal***, FreedomVoice, Grasshopper, Google Voice, Hushed, **IntelePeer***, iPlum, KrispCall, Line2, Nextiva, NY Mobile, **Ooma***, OpenPhone, **Peerless***, **Phone.com***, Phoner, **RingCentral***, **Sangoma***, SecondLine, SideLine, SignalWire, **Sinch***, **SlyNumber***, **Telnyx***, TextNow, **Twilio***, **Vonage***, **Zoom***

* Companies with Direct Numbering Access (IPES and/or CLEC)

Introduction

NumberBarn seeks Direct Numbering Access in order to directly participate in the LNP system, to operate on a level playing field with its competitors, and to improve efficiency, visibility, and reduce costs of providing voice services to its customers.

If approved, NumberBarn will be subject to the same rules and reporting requirements as other IPES companies, which means, among other things:

- Responsible and efficient use of numbering resources
- NRUF reporting
- Various other state & FCC filing & compliance requirements

Introduction

Public comments in opposition to the application largely represent a misunderstanding of NumberBarn's business model and/or a philosophical objection to NumberBarn's marketing choices.

NARUC and its members made unsubstantiated allegations in their public comments regarding NumberBarn, its services, and its customers without first bothering to raise these concerns directly with the Company or doing any meaningful due diligence or investigation.

Their citation to “investigations” that were conducted without notice to and input from NumberBarn carry little to no weight.

Toll-free Numbers

Marketplace Search

Toll-free Numbers - Marketplace Search

There are [REDACTED] "spare" toll-free numbers.*

These numbers **are not assigned to any entity**, and are available **first-come, first-served** to any active Somos Resp Org.

NumberBarn is an active Resp Org in good standing with Somos.

All of these numbers appear in NumberBarn's search results.

If a subscriber orders a TFN from NumberBarn, we **assign** it and it becomes unavailable to any other Resp Org.

If any other Resp Org orders a TFN from Somos, that TFN will disappear from NumberBarn's site.

Toll-free Numbers - Marketplace Search

REDACTED FOR PUBLIC INSPECTION

Spare (vanity) toll-free numbers are searched & marketed industry-wide.

No one hoards or warehouses these numbers; they are available first-come first-served to any Resp
Org. **Search “BIKE”**:

NumberBarn	800.com	FreedomVoice
(888) 581-BIKE - \$18.99 (877) 720-BIKE - \$15.99 (866) 859-BIKE - \$14.99 (855) 825-BIKE - \$14.99 <i>approx 466 results (SPARE)</i>	(888) 581-BIKE - \$25.00 (877) 720-BIKE - \$25.00 (866) 859-BIKE - \$25.00 (855) 825-BIKE - \$25.00	(888) 581-BIKE - \$30.00 (877) 720-BIKE - \$30.00 (866) 859-BIKE - \$30.00 (855) 825-BIKE - \$30.00

800.com and FreedomVoice are unaffiliated NumberBarn competitors

Toll-free Numbers - Marketplace Search

REDACTED FOR PUBLIC INSPECTION

Many wholesale providers maintain small pools of active TFNs in order to support immediate fulfillment of TFN orders on a first-come first-served basis.

This is an industry standard practice and is permissible under the Somos tariff. NumberBarn provides visibility into many of these pools. **Search “BIKE”:**

NumberBarn			
(866) 679-BIKE - \$5.00 (844) 584-BIKE - \$5.00 (855) 474-BIKE - \$12.99 (855) 825-BIKE - \$14.99 (844) 668-BIKE - \$19.00 (844) 871-BIKE - \$19.00	(866) 679-BIKE - \$1.00 (844) 584-BIKE - \$1.00	(855) 474-BIKE - \$30.00 (855) 825-BIKE - \$30.00	(844) 668-BIKE - \$2.15 (844) 871-BIKE - \$2.15

and are wholesale providers unaffiliated with NumberBarn

Toll-free Numbers - Marketplace Search

NumberBarn customers are not permitted to list TFNs for sale through the Marketplace, other than those 1659 numbers that were sold via FCC-approved auction.

Example: (833) 822-2463 e.g. (833) VACCINE.

NumberBarn aggregates the availability of toll-free numbers from a wide variety of sources into the marketplace. The vast majority of these numbers are **unassigned** and available **first-come first served to Resp Orgs and resellers of various wholesale providers**.

Customers who purchase a toll-free number can use it with NumberBarn's voice services or port it to their carrier of choice.

Local Numbers

Marketplace Search

Local Numbers - Marketplace Search

NANPA resources are assigned to providers in blocks of 1000 or 10,000.

Wholesale providers make these **unassigned** numbers available to their customers on a first-come, first-served basis.

NumberBarn is a customer of many wholesale providers and provides visibility into those numbers through its search engine (marketplace).

Local Numbers - Marketplace Search

For example: The "thousand block" 252-483-1XXX

- SUNBURY, NC
- Issued to [REDACTED] on 1/11/2021
- [REDACTED] has assigned approximately 40 of these to customers; those 40 would (presumably) be reported by [REDACTED] on NRUF as **assigned**.
- That leaves approximately 960 telephone numbers ("TNs") that are **unassigned** (and presumably reported on NRUF as **unassigned**) and available to any [REDACTED] wholesale customer on a first-come, first-served basis

Local Numbers - Marketplace Search

Searching 252-483-1XXX on NumberBarn yields:

- 960 TNs currently available from [REDACTED]
- 21 TNs from other NumberBarn customers offering their TNs for sale

The 960 TNs from [REDACTED] are unassigned, and are available through any [REDACTED] reseller, e.g.:

- NumberBarn: (252) 483-1811 - \$49.99
- [REDACTED]: (252) 483-1811 - \$99
- [REDACTED]: (252) 483-1811 - \$1.00
- [REDACTED]: (252) 483-1811 - \$30.00

[REDACTED], [REDACTED], [REDACTED] are unaffiliated with NumberBarn

Local Numbers - Marketplace Search

Similar scenario: Twilio

(858) 330-5894 is currently available first-come, first-served to any Twilio customer.

NumberBarn is a Twilio customer

NumberBarn lists (858) 330-5894 for sale for \$249

██████████ (a Twilio customer) lists (858) 330-5894 for sale as well

If a Twilio customer purchases this number, it will disappear from the NumberBarn site; if a NumberBarn customer purchases this number, Twilio will assign it to NumberBarn (and NumberBarn to the end-user subscriber)

Twilio and ██████████ are unaffiliated with NumberBarn

Local Numbers - Marketplace Search

These demonstrations show that there is nothing nefarious about the NumberBarn search engine.

Millions of users across hundreds of different companies and platforms have access to the same numbers on an first-come, first-served basis.

NumberBarn has no special rights or relationships. It simply provides a tool for customers to locate available numbers – something its competitors with direct access to numbering resources also provide.

NumberBarn's Voice Services

NumberBarn's Voice Services

NumberBarn provides the following voice services to customers who acquire a new number or port-in an existing number:

Park Plan: \$2/mo.

Play a custom outbound voice message; call logs; SMS messaging. Service is targeted to customers in transition who want to keep their number with limited functionality for some time period.

Example use cases include: long-term international vacation; relocating to another state; changing numbers but don't want to "lose" old number yet; simply "not sure" about long term plans for the phone number; security best practices surrounding recycled numbers*

* e.g. <https://recyclednumbers.cs.princeton.edu/assets/recycled-numbers-latest.pdf>

NumberBarn's Voice Services

Forward Plan: \$6/mo.

Park plan + outbound calling (app or browser); call forwarding; basic IVR. **Example use cases include:** "2nd line" forward to cell phone; separating business vs personal calls; testing a new number prior to porting to a landline.

Unlimited Plan: \$19/mo.

Forward plan for higher volume use.

NumberBarn also supports other custom integrations including fax, SIP trunking, etc.

NumberBarn's Voice Services

To set up voice service, the user must either port in a TN or purchase a number from our site. The user generally pays a setup fee (NRC) to activate a new number or to port the number in to NumberBarn, at which point the number is assigned to the user, and they may use it on NumberBarn or port it to their carrier of choice.

Note that because NumberBarn does not have direct numbering access, NumberBarn is currently just a "reseller" -- all active numbers are carried through bona fide wholesale relationships with carriers (for example: [REDACTED], [REDACTED], etc) who have direct numbering access.

NumberGarage

NumberGarage

REDACTED FOR PUBLIC INSPECTION

NumberGarage is a DBA of NumberBarn LLC that focuses on the very-small business (“VSB”) and small business use cases through its “virtual number” service:

- Menus (IVR)
- Dynamic call routing & scheduling
- Find me/follow me (call forwarding)
- Call queueing/ring many
- Voicemail boxes / transcription
- SMS messaging
- An app allows iPhone and Android users to manage calls, messaging, and place VOIP calls

NumberGarage

REDACTED FOR PUBLIC INSPECTION

Common use case for NumberGarage:

- A user is starting a new business or "gig" and wants to use a separate number (other than their personal cell phone or landline number) for the business.
- The user purchases a new phone number through NumberGarage, then configures it to play a menu where certain options forward to their cell phone during business hours or to a general voicemail box after hours.
- As their business needs grow, the user configures additional users, voicemail boxes, and call forwarding destinations.

Interplay Between Voice Services and Marketplace

Interplay Between Voice Services and Marketplace

NumberBarn allows its bona fide voice subscribers to set an "asking price" and list their telephone numbers for sale. This represents a very small percentage of the phone numbers (3%) listed in the marketplace.

Assignment and Control

Assignment and Control

REDACTED FOR PUBLIC INSPECTION

Before NumberBarn reserves a number for a bona fide subscriber:

- The number either doesn't exist (toll-free SPARE) - about 20% of numbers;
- The number is **unassigned** and under the control of one of NumberBarn's carrier partners - about 77% of numbers; or
- The number is **assigned** and listed for sale by one of NumberBarn's subscribers - about 3% of numbers.

Assignment and Control

REDACTED FOR PUBLIC INSPECTION

NumberBarn **reserves** a number when a bona-fide subscriber places the telephone number in their shopping cart.

- This temporarily makes the number unavailable through other channels/competitors
- These reservations typically last for a few minutes, until the subscriber completes their order
- Or the reservation is quickly released if the shopping cart is abandoned

Assignment and Control

After the subscriber completes their order:

- For TFNs, NumberBarn creates a customer record in Somos, **assigns** the number to the end user, and moves the status to WORKING.
- For local TNs, the carrier of record (for example [REDACTED]) **assigns** the number to NumberBarn as a reseller or intermediate provider; NumberBarn **assigns** the number to the end user subscriber.
- In all cases, the number is controlled by the end user subscriber, and they may use NumberBarn voice services, or port it to their carrier of choice.

Assignment and Control

How would this change for NumberBarn with direct access authorization?

- At the time of number fulfillment, NumberBarn would port the number from the current wholesale provider to NumberBarn's own SPID.
- NumberBarn would then be the carrier of record and **assign** the number to the end user subscriber normally.
- NumberBarn would participate directly in the LNP system (as an IPES, rather than as a reseller) when the subscriber chooses to port away.

Closing remarks

Questions?