Interactive Marketing Solutions

Reassigned Numbers Database
Frequently Asked Questions

September 15, 2023

1) What is the RND?

The Reassigned Numbers Database (RND) system securely houses all permanently disconnected US geographic and toll-free numbers, and the date of the most recent permanent disconnection of each of those numbers.

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

2) Who is populating this Database?

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

3) How many numbers are currently in the RND?

Voice providers were required to begin identifying telephone numbers that were permanently disconnected on July 27, 2020, and required to report those disconnected numbers on April 15, 2021, and each month thereafter. Smaller providers began tracking permanent disconnects starting January 27, 2021, and began reporting their disconnects on October 15, 2021, and each month thereafter. The RND currently contains over 361 million geographic and toll-free numbers. That number will continue to grow as carriers report disconnections each month.

4) Why should I use this Database?

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

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

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

5) What is a permanently disconnected telephone number?

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

The complete definition of permanent disconnect is:

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

6) Who are Callers and Caller Agents?

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

Caller Agents are third-party contractors that Callers can contract with to query the Database on their behalf. Interactive Marketing Solutions, Corp is registered as a FCC Caller Agent and submits a substantial number of queries daily, weekly and monthly to the RND on behalf of its clients.

7) Who should use this Database?

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

8) What are the benefits of using the RND?

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

The Consumer Financial Protection Bureau (CFPB), in the Fair Debt Collection Protection Act (Regulation F) has also noted the FCC's RND in the rule as qualifying as a complete and accurate database for debt collectors to confirm a telephone number has not been reassigned before sending a text. Checking the RND can provide defense from the unintentional disclosure of third-party information.

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

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

10) Where can I register to use the RND?

While interested callers may register with the FCC to query the RND , there are substantial advantages to using a Caller Agent such as Interactive Marketing Solutions, Corp to act on their behalf. To contact IMS, please email solutions@ims-dm.com or call us at 203-653-2762.

11) Is using the RND mandatory?

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

12) Do I need to register prior to querying the RND?

Yes. If you wish to use Interactive Marketing Solutions, Corp, you may download and complete our [registration form](#).

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

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

14) What is the "Date of Consent"?

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

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

The RND provides three possible responses:

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

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

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

"No Data" means that No Safe Harbor applies because the telephone number was not permanently disconnected and the date of consent was prior to January 27, 2021. A "No Data" means the queried number and a permanent disconnect date are not contained in the database and the date provided in the query is before January 27, 2021, the date all providers are required to maintain records of the most recent date each number was permanently disconnected numbers to the RND (i.e., the database does not contain either the date or number data queried by the Caller).
Example: 2075551301 – TN has not been disconnected. If Caller queried with 12/30/20, result will be "no_data"

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

Yes, separate login credentials will be required.

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

No, because each query must be made against the respective CompanyID for the client to qualify for Safe Harbor.

18) Who must sign the Letter of Authorization?

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

19) Who is an Authorizer?

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

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

Queries are made through file uploads and IMS has no minimum or maximum query file sizes. Upload the .txt file containing the telephone numbers to be queried through our SFTP or SmartClean upload. You will be notified when the process has been completed and the file is ready to be picked up.

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22) Is there an automated process?

Yes, a Secure Fire Transfer Protocol (SFTP) is available.

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

Yes, via email, you will be notified that the result file can be downloaded.

24) What is the pricing for using this Database?

Companies using IMS as a caller agent do not have to purchase time-sensitive query packages. Prices are on a per query basis and vary depending on the number of TNs in an uploaded batch as well as the frequency of uploads. Please call or email for prices.

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

No.

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

No, the RND administrator does not issue credits for erroneous submissions.