

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Dialwave, Inc.)
For Authorization to Obtain Numbering) WC Docket No. 25 - _____
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

**APPLICATION OF DIALWAVE, INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

The Commission's Numbering Order established that interconnected VoIP providers may obtain numbering resources from the Numbering Administrator by showing authority to provide service in the territory where numbers are sought. Dialwave, Inc. ("Dialwave") seeks such authority and submits the information required by 47 C.F.R. § 52.15(g)(3)(ii) as of the day of filing.

a. INFORMATION REQUIRED BY 47 C.F.R. § 52.15(g)(3)(ii):

1. 47 C.F.R. § 52.15(g)(3)(ii)(A)

Name: Dialwave, Inc.
Address: 31 West 34th Street
8th Floor
New York, NY 10001
Telephone: +1 888 899 9283

Contact for Regulatory Requirements, Compliance, 911, and Law Enforcement:

Name: Robert Nichols
Address: 31 West 34th Street
8th Floor
New York, NY 10001
Telephone: +1 888 899 9283
Email: robert.nichols@dialwave.com

2. 47 C.F.R. § 52.15(g)(3)(ii)(B)

Dialwave acknowledges that the authorization granted under 47 C.F.R. § 52.15(g)(3) is subject to compliance with applicable Commission numbering rules, numbering authority delegated to the states, and state laws, regulations, and registration requirements. Dialwave acknowledges that authorization is subject to compliance with industry guidelines and numbering practices applicable to telecommunications carriers. The numbering resources subject to this Application will be used at first in the state of New York.

3. 47 C.F.R. § 52.15(g)(3)(ii)(C)

Dialwave certifies that it will not use the numbers obtained pursuant to an authorization granted under 47 C.F.R. § 52.15(g)(3) to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under 47 C.F.R. §§ 64.1200, 64.1604, 64.6300–64.6308, and 16 C.F.R. § 310.3(b).

4. 47 C.F.R. § 52.15(g)(3)(ii)(D)

Dialwave certifies that it has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and that it has filed a certification in the Robocall Mitigation Database as required by 47 C.F.R. §§ 64.6301–64.6305.

5. 47 C.F.R. § 52.15(g)(3)(ii)(E)

- i. Dialwave certifies that it complies with its 911 obligations as outlined in 47 C.F.R. Part 9. Evidence in support of this certification can be found in ***Confidential Exhibit A***. Dialwave requests confidential treatment under

Commission rules for ***Confidential Exhibit A*** and is submitting ***Confidential Exhibit A*** separately in accordance with its request for confidential treatment.

- ii. Dialwave certifies that it complies with the provisions of the Communications Assistance with Law Enforcement Act (CALEA), as set forth in 47 U.S.C. § 1001 et seq. Evidence in support of this certification can be found in ***Exhibit B***.

6. 47 C.F.R. § 52.15(g)(3)(ii)(F)

Dialwave certifies that it complies with the Access Stimulation rules under 47 C.F.R. § 51.914.

7. 47 C.F.R. § 52.15(g)(3)(ii)(G)

Dialwave understands and acknowledges that it must file requests for numbers with the relevant state commissions at least 30 days prior to requesting numbers from the Numbering Administrators.

8. 47 C.F.R. § 52.15(g)(3)(ii)(H)

Dialwave has the operational capability to provide services within sixty (60) days of the numbering resource activation date. As evidence of this readiness, attached as ***Confidential Exhibit C*** is an interconnection agreement between Dialwave and its carrier partner. Additionally, attached as ***Confidential Exhibit D*** is an interconnection agreement between Dialwave's carrier partner and a local exchange carrier in New York. Dialwave requests confidential treatment for both exhibits under Commission rules and is submitting them separately in accordance with its request.

9. 47 C.F.R. § 52.15(g)(3)(ii)(I)

Dialwave certifies that it has filed FCC Forms 477 and 499. Evidence in support of this certification can be found in ***Exhibit E***.

10. 47 C.F.R. § 52.15(g)(3)(ii)(J)

Dialwave certifies that it complies with its Universal Service Fund contribution obligations under 47 C.F.R. Part 54, Subpart H; its Telecommunications Relay Service contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii); its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32; and its obligations to pay regulatory fees under 47 C.F.R. § 1.1154.

11. 47 C.F.R. § 52.15(g)(3)(ii)(K)

i. Dialwave certifies that it possesses the financial, managerial, and technical expertise to provide reliable service.

ii. Dialwave's key management and technical personnel are as follows:

Robert Nichols, Chief Executive Officer

iii. Neither Dialwave, nor any of the identified key management 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 47 C.F.R. Chapter I, applicable to unlawful robocalls or unlawful spoofing.

12. 47 C.F.R. § 52.15(g)(3)(ii)(L)

i. 47 C.F.R. § 63.18(h)

Name:	Robert Nichols
Address:	31 West 34th Street
	8th Floor
	New York, NY 10001
Citizenship:	US
Principal Business:	Telecommunications
Shares Owned:	100%

ii. 47 C.F.R. § 63.18(i)

Dialwave is not a foreign carrier, is not associated with a foreign carrier, and is 100% directly owned by a single individual. As there are no intervening entities, no equity interests are held indirectly.

13. 47 C.F.R. § 52.15(g)(3)(ii)(M)

Dialwave certifies that no party to this application is subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

14. 47 C.F.R. § 52.15(g)(3)(ii)(N)

The undersigned declares, under penalty of perjury pursuant to 47 C.F.R. § 1.16, that all statements in this application and supporting exhibits are true and accurate.

b. REQUEST FOR CONFIDENTIAL TREATMENT

1. 47 C.F.R. § 0.459(b)(1)

Dialwave seeks confidential treatment of *Confidential Exhibit A*,

Confidential Exhibit C, and Confidential Exhibit D.

2. 47 C.F.R. § 0.459(b)(2)

As proof of Dialwave's compliance with 47 C.F.R. Part 9 as required by 47 C.F.R. § 52.15(g)(3)(ii)(E), Dialwave is submitting technical details of its 911 integration and agreement with its carrier partner as *Confidential Exhibit A*.

As proof of Dialwave's facilities readiness as required by 47 C.F.R. § 52.15(g)(3)(ii)(H), Dialwave is submitting the interconnection agreement between it and its carrier partner as *Confidential Exhibit C*. Dialwave is also submitting the interconnection agreement between Dialwave's carrier partner and a local exchange carrier in New York as *Confidential Exhibit D*.

3. 47 C.F.R. § 0.459(b)(3)

Confidential Exhibit A describes the technical details of Dialwave's 911 integration. *Confidential Exhibit A, Confidential Exhibit C, and Confidential Exhibit D* contain agreements between Dialwave and its carrier partner. All three exhibits contain proprietary commercial information regarding the operations, pricing, network, services, and operating costs of both Dialwave and its carrier partner.

4. 47 C.F.R. § 0.459(b)(4)

Confidential Exhibit A, Confidential Exhibit C, and Confidential Exhibit D contain information relating to commercial matters that could be used to the

competitive disadvantage of Dialwave. Dialwave has numerous competitors in the Voice over Internet Protocol (“VoIP”) services sector in which it operates.

Detailed operations and commercial information of the type provided by Dialwave could compromise Dialwave’s position in this highly competitive industry. Release would therefore result in substantial competitive harm to Dialwave.

5. 47 C.F.R. § 0.459(b)(5)

Competitors could use Dialwave’s proprietary commercial and operational information to Dialwave’s detriment as they would gain access to sensitive information about how Dialwave provides services as well as about Dialwave’s commercial agreements with others in the market that are not normally disclosed to the public.

6. 47 C.F.R. § 0.459(b)(6)

Dialwave has not disclosed the information in ***Confidential Exhibit A***, ***Confidential Exhibit C***, and ***Confidential Exhibit D*** to the public.

7. 47 C.F.R. § 0.459(b)(7)

Dialwave has not disclosed the information in ***Confidential Exhibit A***, ***Confidential Exhibit C***, and ***Confidential Exhibit D*** to the public or third parties.

8. 47 C.F.R. § 0.459(b)(8)

Dialwave requests that ***Confidential Exhibit A***, ***Confidential Exhibit C***, and ***Confidential Exhibit D*** be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information contained in the exhibits.

9. 47 C.F.R. § 0.459(b)(9)

The information concerns Dialwave's proprietary network information, related to current and planned commercial and operational information, and, as such, is commercially sensitive.

c. CONCLUSION

Dialwave respectfully requests that the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

/s/ Robert Nichols
Robert Nichols
CEO
Dialwave, Inc.
robert.nichols@dialwave.com

Dated: June 24, 2025

LIST OF EXHIBITS

Confidential Exhibit A	911 Technical Details and Compliance
Exhibit B	Communications Assistance with Law Enforcement Act (CALEA) Compliance
Confidential Exhibit C	Interconnection Agreement Between Dialwave, Inc. and Its Carrier Partner
Confidential Exhibit D	Interconnection Agreement Between Carrier Partner and Local Exchange Carrier
Exhibit E	Proof of Filing FCC Forms 477 and 499

CONFIDENTIAL EXHIBIT A

911 Technical Details and Compliance

REDACTED

EXHIBIT B

Communications Assistance with Law Enforcement Act (CALEA) Compliance

Communications Assistance for Law Enforcement Act System Security and Integrity Plan Robert Nichols

To be able to access the form to file a Systems Security & Integrity (SSI) Plan, the filer must enter an FRN of the entity required to submit a SSI Plan. Please use the drop-down toggle button in the field below to select the FRN of the entity for which you intend to file an SSI Plan.

Privacy Act Notice

Sensitive Nature of Information: The Commission recognized in its Report and Order in CC Docket No. 97-213 that SSI plans are sensitive in nature. See Communications Assistance for Law Enforcement Act, CC Docket No. 97-213, Report and Order, 14 FCC Rcd 4151, 4177 ¶ 57 (1999).

Confidentiality: Pursuant to 47 C.F.R. § 0.459 of the Commission's rules, parties who believe their SSI plan should be withheld from public inspection may request confidential treatment. If requesting confidential treatment, such requests must identify the specific information for which confidential treatment is sought. For Guidance, see CALEA webpage: <https://www.fcc.gov/calea>.

Click the toggle button to the right for a list of associated FRNs. If none appears, read the note below.

0031433543 - Dialwave, Inc. X 

 File SSI Plan  View User Manual

Number	Created	Carrier Name	FRN	SSI Attachment Link
SSI0001558	2025-06-23 21:10:02	Dialwave, Inc.	0031433543	 Download

CONFIDENTIAL EXHIBIT C

Interconnection Agreement Between Dialwave, Inc. and Its Carrier Partner

REDACTED

CONFIDENTIAL EXHIBIT D

Interconnection Agreement Between Carrier Partner and Local Exchange Carrier

REDACTED

EXHIBIT E

Proof of Filing FCC Forms 477 and 499

The screenshot shows the FCC Broadband Data Collection System interface. At the top, there's a header with the FCC logo and "Federal Communications Commission" text, followed by "Broadband Data Collection System". On the right side of the header, there are links for "Help" and "Robert Nichols". Below the header is a blue navigation bar with the text "Submissions Dashboard".

Entity Selection

This section shows a table titled "Broadband Data Collection System" with the following data:

FRN	Entity Name	Entity Type	Filing Status	Action Required
0031433543	Dialwave, Inc.	Service Provider	✓	

Below the table, it says "Showing 1 of 1". At the bottom right, there is a note: "Form 477 OMB Control Number 3060-0816".

The screenshot shows the "FCC Form 499" page. At the top left is the USAC logo. In the center is the title "FCC Form 499". To the right is an email address "robert.nichols@dialwave.com" with a dropdown arrow. The main content area displays the entity information: "Dialwave, Inc." and "834682". Below this, the "Filer Status: Active" is shown. There are two buttons: "Company Contacts" and "Associated 498 IDs".

This section shows the "499 Forms" tab selected. It includes a "Sort By" dropdown set to "All Forms". The table displays the following data:

499 Forms	Receipt Date	Status	View	Action
499-Q - August 2025 Filing	Not Started		Start Form	
499-Q - May 2025 Filing	05/02/2025	Approved		Revise Certify
499-A - 2025 Filing - Rev 1	04/29/2025	Approved		Revise Certify

At the top of the table, there are filters for "Displaying 1 to 10 of 37 records", a "Bulk Certify" button, and a search bar with a magnifying glass icon.