

APELA Professional Services, LLC
Complex Telecommunications Consulting
3462 Blanding Ct
Buford, GA. 30519
Telephone: 404-519-4096

July 03, 2025

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Request for Confidential Treatment to the Application of ULEC, LLC which transacts business under the name ULEC, LLC, for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of the Commission's Rules

Dear Ms. Dortch,

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, ULEC, LLC; here forward known as ("ULEC, LLC") hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

ULEC, LLC 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, **Exhibit D** to this application in its entirety as confidential because the documents contain trade secrets and commercially sensitive "Pricing" information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). The information in **Exhibit D** is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. ULEC, LLC respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibit D is accordingly marked with "Confidential and Proprietary – Filed Under Seal Pursuant to 47 C.F.R. §0.459."

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ULEC, LLC hereby states as follows:

1. **SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT PURSUANT TO 47 CFR § 0.459(b)(1).**

ULEC, LLC seeks confidential treatment of **Exhibit D** in its entirety.

2. CIRCUMSTANCES CAUSING THE SUBMISSION PURSUANT TO 47 CFR § 0.459(b)(2).

ULEC, LLC is submitting the confidential agreements between it and its ICA/CLEC partner as proof of ULEC, LLC' facilities readiness as required by Section 52.15(g)(3)(i)(D) of the Commission's rules.

3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED PURSUANT TO 47 CFR § 0.459(b)(3).

The information for which ULEC, LLC seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors" as defined in 47 CFR § 0.457(d)(2). Confidential **Exhibit D** consists of commercial agreements between ULEC, LLC and its CLEC partner of which contain proprietary information concerning ULEC, LLC network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION PURSUANT TO 47 CFR § 0.459(b)(4).

Confidential **Exhibit D** contains information relating to commercial matters that could be used by competitors to ULEC, LLC disadvantage. ULEC, LLC has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by ULEC, LLC could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to ULEC, LLC.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM PURSUANT TO 47 CFR § 0.459(b)(5).

Competitors could use ULEC, LLC proprietary and commercial information to its detriment as they would gain access to sensitive data about how ULEC, LLC provides services as well as about ULEC, LLC commercial agreements with others in the market that are not normally disclosed to the public.

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(6).

ULEC, LLC has not distributed the information in Confidential **Exhibit D** to the public or any parties within ULEC, LLC or outside ULEC, LLC except on a need-to-know basis.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES PURSUANT TO 47 CFR § 0.459(b)(7).

ULEC, LLC deems the information in **Exhibit D** to be confidential.

8. JUSTIFICATION OF THE TIME FRAME DURING WHICH THE SUBMITTING PARTY BELIEVES THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(8).

ULEC, LLC requests that Confidential **Exhibit D** be treated as confidential for a period of five years. This period is necessary due to the proprietary nature of the information in Confidential **Exhibit D**.

9. ADDITIONAL INFORMATION THAT ULEC, LLC BELIEVES MAY BE HELPFUL IN DETERMINING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED PURSUANT TO 47 CFR § 0.459(b)(9).

The information deals with ULEC, LLC proprietary network, related to current and planned operations, and as such, is commercially sensitive.

If you should have any questions or concerns, please feel free to contact me at your convenience at 404-519-4096 or rongrob@apelaprofsvcs.com.

Respectfully submitted,



Ronald J Grob
APELA Professional Services, LLC
Senior Telecommunications Consultant To ULEC, LLC

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

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

**APPLICATION OF ULEC, LLC FOR AUTHORIZATION TO OBTAIN
NUMBERING RESOURCES**

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, ULEC, LLC, which transacts business under the name ("ULEC, LLC" or the "Company")(AKA "ULEC"), hereby submits its application to obtain numbering resources as described below.

Under the Commission's Numbering Order, an Interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon showing that it is authorized to provide service in the area for which the numbering resources are requested. Such authorization may be obtained upon an application to the Commission containing the information detailed in Section 52.15 (g)(3)(i)(A)-(G) of the Commission's Rules. ULEC hereby requests that the Commission grant it such authorization. In support of this application, ULEC provides the following information.

ULEC has negotiated an Interconnect Agreement with a Competitive Local Exchange Carrier ("CLEC Partner") to serve as ULEC's access homing tandem and to route local and access traffic (both originating and terminating) to the PSTN. ULEC will interconnect with and broadcast CLEC Partner's tandem platforms for the purpose of managing ULEC's assigned Operating Company Number (OCN) and number Resources.

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I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)

A. § 52.15(g)(3)(i)(A)

Name: ULEC, LLC
Street: 8310 S Valley Hwy
Suite: 3060
City: Centennial
State: CO
ZIP Code: 80223

Executive for ULEC, LLC:

Name: Kimberly Cupps
Street: 8310 S Valley Hwy
Suite: 3060

City: Englewood
State: Co
ZIP Code: 80112
Email: Kim@ulec.com

Contact for Regulatory Filing, IPES license information, FCC filing information, IPES general information:

Name: Ronald J. Grob
Street: 3462 Blanding Ct.
City: Buford
State: GA
ZIP Code: 30519
Email: rongrob@apelaprofsvcs.com

• **B § 52.15(g)(3)(i)(B)**

ULEC hereby acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's Rules is subject to compliance with applicable Commission numbering rules as well as to the numbering authority delegated to the states. The Company hereby also acknowledges that this authorization is subject to compliance with the state laws, regulations, and registration requirements applicable to businesses operating in each state where the applicant seeks numbering resources, as well as with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers. ULEC intends to offer services immediately in several states initially (Colorado & Texas) and seeks authority to access numbering resources throughout the United States, based on its PSTN Providers' footprint. See **Exhibit D.**

• **C. § 52.15(g)(3)(i)(C)**

ULEC is committed to providing full support for its customers concerning Robocall Mitigation and call Blocking where appropriate. The Company certifies that it will not use the numbers obtained under an authorization to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 et seq. of this chapter, and 16 CFR 310.3(b).

- **D. § 52.15(g)(3)(i)(D)**

ULEC has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and has filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 to 64.6305. The Company will provide the necessary "KYC" documentation for its customers as required by STI-GA Authorities. In addition, ULEC will pass the STIR/SHAKEN certificate, without modification, to each carrier with which it exchanges call traffic. A copy of the filed Robocall Mitigation Database documentation is attached as **Exhibit A**.

- **E. § 52.15(g)(3)(i)(E)**

ULEC hereby certifies that it complies with its 911 and 988 obligations under part 9 of the relevant chapter. The Company also complies with the provisions of the Communications Assistance with Law Enforcement Act, 47 U.S.C. 1001 et seq. (CALEA) as documented in **Exhibit B4**.

ULEC complies with the applicable 911/ 988 rulings through its Interconnection agreement with a certified carrier, as attested in **Exhibit B3**.

- **F. § 52.15(g)(3)(i)(F)**

ULEC hereby certifies that it complies with the Access Stimulation rules under § 51.914.

- **G. § 52.15(g)(3)(i)(G)**

ULEC acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators. State 30-day notifications will be submitted with each NANPA request for Number Resources.

- **H. § 52.15(G)(3)(ii)(H)**

ULEC authenticates its capability to provide service within 60 days of the numbering resources activation date. An interconnect agreement demonstrating access to the platform and capability of CLEC Partner's network is attached to this application as **Exhibit D**. The Company requests confidential treatment under the Commission's rules for **Exhibit D**.

The Company is managed by long-time professionals experienced with the telecommunications market, and in addition, has a staff of highly skilled technical and operational employees.

- **I. § 52.15(g)(3)(ii)(I)**

ULEC certifies that they will file both 477 and 499 FCC filings as appropriate and required. According to the applicable regulation, ULEC has not submitted the 477/499

forms to the FCC, as ULEC has just initially begun the provisioning of VoIP services. As soon as ULEC has provisioned its VoIP Customers with services, all the mandatory forms shall be submitted in due time.

- **J. § 52.15(g)(3)(ii)(J)**

ULEC hereby certifies that it will comply with its: Universal Service Fund contribution obligations under 47 CFR part 54, subpart H; Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii); North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17 and 52.32; obligations to pay regulatory fees under 47 CFR §1.1154; and 911 obligations under 47 CFR part 9. ULEC's FRN and 499 filer ID are included in **Exhibit B1 and B2**, respectively.

- **K. § 52.15(g)(3)(ii)(K)**

The Company certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, led by a strong, experienced management team with substantial managerial experience in the private telecommunications and enhanced data communication services industries, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services. ULEC's key management personnel are identified in attached **Exhibit C**. None of ULEC nor any of the identified personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order, including the Commission's rules applicable to unlawful robocalls or unlawful spoofing.

- **L. § 52.15(g)(3)(ii)(L)**

ULEC is a corporation organized under the laws of the State of Colorado. The following are the only individuals, each of whom is a citizen of the United States, who beneficially own ULEC:

Kimberly Cupps

ULEC certifies that it is not affiliated with: (a) any foreign carrier, or (b) has any interlocking directorates with a foreign carrier

- **M. § 52.15(g)(3)(ii)(M)**

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

- **N. § 52.15(g)(3)(ii)(N)**

An officer's Declaration as per Section 1.16 of the Commission's rules is attached hereto as EXHIBIT E

II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)

As required by Section 52.15(g)(3)(iv), ULEC will maintain the accuracy of all contact information and certifications in this application and will file a correction with the Commission and each applicable state within 30 days of any changes. ULEC will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

III. CONCLUSION

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, ULEC respectfully requests that the Commission grant this application for authorization to obtain numbering resources. The undersigned declares, under penalty of perjury pursuant to § 1.16 of this chapter, that all statements in the application and any appendices are true and accurate.

Respectfully submitted for ULEC, LLC.



Ronald J Grob
Principal Telecommunications Consultant
To ULEC, LLC
APELA Professional Services, INC.

Exhibit A

A1. RoboCall Mitigation Plan

ULEC, LLC

Robocall Mitigation Plan

Version 1.0 - January 2025

ULEC, LLC

8310 South Valley Highway, Suite 3060
Greenwood Village, CO 80112

Contact: Kim Cupps, President

Phone: (720) 547-7369

Email: Kim@ulec.com

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1. Robocall Mitigation Program Introduction

Pursuant to the applicable orders and regulations of the Federal Communications Commission ("FCC" or "Commission"), the following is ULEC, LLC's ("ULEC" or "Company") Robocall Mitigation Program ("RMP") that has been established to prevent unlawful robocalls from originating, terminating, or being carried or processed on ULEC's voice network where it operates as a Voice Service Provider, Gateway Provider, or Non-Gateway Intermediate Provider.

This RMP has been developed in accordance with the FCC's Sixth and Seventh Report and Orders implementing the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act. Unless defined differently herein, capitalized terms used herein have the same definitions as set forth under 47 C.F.R § 64.6300.

2. Company Summary

ULEC, LLC is a telecommunications provider focused on delivering reliable voice and communications services to commercial customers. ULEC operates as a Voice Service Provider with direct access to numbering resources pursuant to license from the Federal Communications Commission.

Depending on the services being provided, ULEC may serve as a Voice Service Provider, Gateway Provider, or Non-Gateway Intermediate Provider to commercial customers. ULEC does not serve residential customers and maintains a focused approach on business communications solutions.

3. Filing of RMP and Implementation of STIR/SHAKEN

In submitting this RMP with the FCC, ULEC states that:

All calls it originates, carries, or processes on its network are subject to this RMP
Its prior certification has not been removed by Commission action

It has not been prohibited from filing in the Robocall Mitigation Database ("RMD")
by the Commission

Pursuant to 47 C.F.R. § 64.6305(d)(1)(i), (e)(1)(i) and (f)(1)(i), ULEC has certified
that it has fully implemented STIR/SHAKEN across its network and all calls it
originates, carries, or processes are compliant with 47 C.F.R. §§ 64.6301(a)(1) and
(2), and 64.6302(b).

ULEC's role in the call chain includes being:

- A Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users
- A Voice Service Provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls on behalf of another provider or providers
- A Gateway Provider with a STIR/SHAKEN obligation
- A Non-Gateway Intermediate Provider with a STIR/SHAKEN obligation

4. Robocall Mitigation Program Components

This RMP applies to ULEC's calling platforms and details the specific reasonable steps ULEC has taken to avoid originating, terminating, or carrying or processing illegal robocall traffic through the following comprehensive measures:

5. Know Your Customer and Upstream Provider Protocols

ULEC has implemented comprehensive Know Your Customer (KYC) and Know Your Upstream Provider policies and procedures used when onboarding new or renewing customers to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct.

Customer Verification Process:

- Collection of business contact and company information for each new customer
- Verification of business legitimacy and operational status
- Assessment of intended use cases for telecommunications services
- Implementation of tiered verification levels based on traffic volume requirements

Upstream Provider Verification:

- Confirmation that upstream providers are appropriately listed in the FCC's RMD
- Verification that providers have not been delisted pursuant to an enforcement action
- Regular monitoring of upstream provider status in the RMD
- Due diligence review of upstream provider business practices and compliance history

Consistent with FCC Caller ID Authentication Best Practices No. 16 and 47 C.F.R. § 64.1200(n)(4), ULEC vets the identity of retail and wholesale subscribers in conjunction with approving applications for service, provisioning network connectivity, entering into contract agreements, and granting right-to-use telephone number resources.

6. Contractual Provisions to Mitigate Illegal Robocalls

ULEC's commercial voice service customers are subject to robust terms and conditions that obligate customers not to use ULEC's services for unlawful purposes and preserve ULEC's right to terminate customers for violations of the law.

Acceptable Use Policy Requirements:

ULEC mandates that each agreement with its customers incorporates ULEC's Acceptable Use Policy (AUP), which prohibits the use of ULEC's network, machines, or services in any manner that:

- Violates any applicable law, regulation, treaty, or tariff, including but not limited to data privacy laws and laws restricting or prohibiting unlawful robocalls, telemarketing calls or messages, and use of auto dialers
- Violates the acceptable use policies of any networks, machines, or services accessed through ULEC's network
- Violates the privacy of others

- Involves deceptive online marketing practices or violates FTC guidelines for proper marketing or telemarketing
- Involves the use or transmission of fraudulent traffic or fraudulent activity, including call spoofing, traffic pumping fraud, and fraudulent bot traffic
- Falsifies, manipulates, spoofs, or otherwise tampers with user identification information and/or caller identification information
- Fails to authenticate call traffic in accordance with applicable laws and regulations
- Furnishes false or incorrect data or information to ULEC
- Impersonates or misrepresents the customer's affiliation with any person or entity

Compliance Requirements:

- All customers must comply with the Telephone Consumer Protection Act and its implementing regulations
- Compliance with the Telemarketing Sales Rule required
- Adherence to regulations implementing the FCC's national Do-Not-Call registry mandatory
- Communications Service Provider customers are responsible for ensuring their own customers' compliance with the AUP

Enforcement Provisions:

ULEC reserves the right to suspend or terminate service without notice for violations of the AUP or applicable law. In such instances, ULEC will discontinue service and may seek legal recourse to recover all costs involved in enforcement.

7. Telephone Number Validation and Authorization

ULEC's telephone number authorization process is primarily based on direct assignment of telephone numbers to customers either via purchase through ULEC's systems or successful port onto the ULEC network.

Authorization Process:

- Direct TN assignment through ULEC's numbering inventory
- Letter of Authorization (LOA) process for number porting
- Verification with losing carriers for port validation
- Confirmation of customer's right to use specific telephone numbers

Attestation Standards:

When originating a call, ULEC checks the calling party number against ULEC's inventory and provides appropriate attestation based on:

- Industry standards and best practices
- Customer's proven ownership or authorization to use the number
- Historical performance and compliance record of the customer

For customers wishing to use TNs not directly managed by ULEC, attestation adjustments may be made if the customer:

- Is an existing ULEC customer in good standing
- Can provide proof of KYC or TN validation process for their customers
- Has received no industry complaints (tracebacks, vendors, or subpoenas) during their tenure with ULEC

8. Do-Not-Originate List Management

Gateway Provider Operations:

When routing traffic as a Gateway Provider, ULEC blocks calls in accordance with FCC Rule 47 C.F.R. § 64.1200(o)(1)-(4) purporting to originate from a number on a reasonable Do-Not-Originate (DNO) list associated with North American Numbering Plan (NANP) numbers.

Voice Service Provider Operations:

When serving as a Voice Service Provider, ULEC may block calls in accordance with FCC Rule 47 C.F.R. § 64.1200(k)(2), including:

- Calls originating from DNO numbers
- Calls identified through reasonable analytics as highly likely to be associated with one-ring scams
- Calls with invalid ANI information

DNO List Maintenance:

- Regular updates to DNO lists based on industry standards
- Implementation of protocols to detect and block DNO calls
- Monitoring and analysis of blocked call patterns

9. Traffic Source Verification

ULEC only accepts traffic from providers that satisfy minimum regulatory requirements:

Domestic Voice Service Providers:

In accordance with 47 C.F.R. § 64.6305(g)(1), ULEC accepts calls directly from domestic Voice Service Providers only if:

- The provider's filing appears in the RMD
- The filing has not been de-listed pursuant to an enforcement action

Foreign Voice Service Providers:

In accordance with 47 C.F.R. § 64.6305(g)(2), ULEC accepts calls from Foreign Voice Service Providers or Foreign Intermediate Providers that use NANP resources in the caller ID field only if:

- The foreign provider's filing appears in the RMD
- The filing has not been de-listed pursuant to an enforcement action

Gateway and Intermediate Providers:

ULEC applies similar verification requirements for Gateway Providers and Non-Gateway Intermediate Providers, ensuring all upstream sources maintain current, valid RMD filings.

10. Network Traffic Analysis and Monitoring

ULEC employs comprehensive traffic analysis and monitoring systems to detect suspicious activity and potential illegal robocall traffic.

Internal Monitoring Systems:

- Daily extraction and analysis of call traffic data
- Monitoring of call length and call count patterns
- Analysis of answer success rates (ASR) and average call duration (ACD)
- Review of cancel/86 reports and other carrier performance indicators
- Real-time monitoring of traffic volume and patterns

Third-Party Analytics:

ULEC utilizes third-party analytics providers, including YouMail and other recognized industry solutions, to enhance robocall detection capabilities through:

- Machine learning algorithms for pattern recognition
- Industry-wide threat intelligence sharing
- Advanced analytics for suspicious calling behavior identification
- Automated alerting systems for potential fraudulent activity

Monitoring Metrics:

Activity is flagged as suspicious based on analysis of:

- Abnormal call volume patterns
- Unusual geographic distribution of calls
- Poor call completion rates
- High complaint ratios
- Known fraudulent calling signatures
- Payment method irregularities

11. Investigation of Suspicious Calling Patterns

When ULEC's monitoring systems detect call patterns consistent with illegal robocalling, the company conducts thorough investigations and takes appropriate corrective action.

Investigation Process:

- In-depth review by ULEC's engineering and compliance teams
- Direct contact with customers or carrier partners to address suspicious activity
- Enhanced monitoring and reporting for specific customers under review
- Coordination with Industry Traceback Group when appropriate
- Documentation of all investigation activities and outcomes

Corrective Measures:

Depending on the severity of conduct and customer response, corrective measures may include:

- Customer warnings and education
- Traffic throttling or limitations
- Enhanced monitoring requirements
- Service suspension
- Service termination
- Reporting to appropriate authorities
- Cooperation with law enforcement investigations

12. Foreign Provider Traffic Management

Pursuant to 47 C.F.R. § 64.1200(n)(5), ULEC takes reasonable and effective steps to ensure that any originating provider or intermediate provider, foreign or domestic, from which it directly receives traffic is not using ULEC to carry or process a high volume of illegal traffic onto the U.S. network.

Foreign Provider Oversight:

- Enhanced due diligence for foreign providers
- Regular review of traffic patterns from international sources
- Coordination with international traceback efforts
- Implementation of additional monitoring for foreign-originated traffic

13. Voice Traffic Authentication

ULEC implements comprehensive voice traffic authentication in accordance with applicable FCC regulations:

Voice Service Provider Authentication (47 C.F.R. § 64.6301(a)):

- Authentication and verification of caller identification information for all SIP calls exclusively transiting ULEC's network
- Authentication of caller identification information for all SIP calls ULEC originates

- Verification of caller identification information for all SIP calls ULEC receives from other providers

Gateway Provider Authentication (47 C.F.R. § 64.6302(c)):

- Authentication of caller identification information for all calls using NANP resources in the caller ID field
- Proper handling of unauthenticated calls received from upstream providers

Non-Gateway Intermediate Provider Authentication (47 C.F.R. § 64.6302(d)):

- Authentication of caller identification information for calls received directly from originating providers
- Proper forwarding of authentication information to downstream providers

14. Traceback Response Protocol

ULEC is committed to ensuring its network is not utilized for unwanted and illegal robocalls and maintains a robust traceback response system.

Response Commitment:

In accordance with FCC regulations 47 C.F.R. § 64.1200(n)(1) and 47 C.F.R. § 64.6305, ULEC will:

- Respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium (ITG) within 24 hours during business days
- Cooperate fully with investigating entities in stopping illegal robocallers
- Take effective steps to mitigate illegal traffic when receiving written notice from the Commission's Enforcement Bureau
- Maintain detailed records of all traceback responses and investigations

Documentation and Cooperation:

- Comprehensive logging of all traceback requests and responses
- Coordination with upstream and downstream providers as needed
- Preservation of relevant call detail records and traffic analysis data
- Provision of technical assistance to authorized investigating entities

15. Designated Compliance Officer

To ensure ULEC's network is not utilized for unwanted and illegal robocalls, ULEC designates the following individual to lead robocall mitigation efforts and respond to traceback inquiries:

Contact Name: Kim Cupps
Contact Title: President

Contact Business Address: 8310 South Valley Highway, Suite 3060

Contact City: Greenwood Village

Contact State and Zip Code: Colorado, 80112

Contact Telephone Number: (720) 547-7369

Contact Email: Kim@ulec.com

This designated officer is responsible for:

- Overseeing implementation and maintenance of the RMP
- Coordinating responses to traceback requests
- Managing relationships with industry partners and regulatory bodies
- Ensuring ongoing compliance with FCC requirements
- Directing investigation of suspicious calling patterns

16. Plan Updates and Maintenance

Regular Updates:

Consistent with FCC Regulations 47 C.F.R. § 64.6305(d)(5), (e)(5) and (f)(5), ULEC will:

- Update its submission in the RMD within 10 business days of any material change
- Review and update this RMP annually or as regulatory requirements change
- Monitor industry best practices and incorporate improvements as appropriate

Continuous Improvement:

ULEC's participation in industry working groups and monitoring of regulatory developments ensures this RMP evolves to address emerging threats and incorporates best practices from the telecommunications industry.

17. Training Program

ULEC has implemented a comprehensive training program focused on ensuring personnel receive appropriate training on issues related to illegal robocalls and regulatory compliance.

Management Training:

All management-level employees maintain continuing education on:

- Company RMP policies and procedures
- Latest FCC orders and regulatory requirements
- Scam and fraudulent traffic patterns and detection methods
- Robocall mitigation technologies and techniques
- Law enforcement cooperation requirements
- Call authentication protocols and requirements

- Industry best practices and emerging trends

Training Objectives:

- Ensure staff understanding of ULEC's role in robocall mitigation
- Maintain current knowledge of regulatory requirements
- Develop expertise in fraud detection and prevention
- Foster cooperation with industry and regulatory partners
- Support ULEC's strategic position as a responsible telecommunications provider

Ongoing Education:

ULEC treats continuing legal and technical education as critical to its role in the telecommunications ecosystem and its position as a partner in mitigating illegal traffic.

Document Version: 1.0

Last Updated: January 2025

Next Review: January 2026 or upon regulatory changes

Approved By: Kim Cupps, President ULEC, LLC

EXHIBIT B

B1.FCC FRN

Registration Detail	
FRN:	0037029717
Registration Date:	05/12/2025 08:24:06 PM
Last Updated:	05/19/2025 06:30:04 PM
Entity Name:	ULEC LLC
Entity Type:	Private Sector , Limited Liability Corporation
Contact Organization:	ULEC LLC
Contact Position:	Sr Associate
Contact Name:	Kimberly Cupps
Contact Address:	8310 South Valley Highway FL 3 Ste 3060 Englewood, CO 80112 United States
Contact Email:	Kim@ulec.com
ContactPhone:	(844) 571-8532
ContactFax:	

EXHIBIT B

B2. 499 Filer ID

499 Filer ID Number: **837734**
Registration Current as of: **4/1/2025**
Legal Name of Reporting Entity: **ULEC LLC**
Doing Business As:
Principal Communications Type: **Interconnected VoIP**
Universal Service Fund Contributor: **No**
(Contact USAC at 888-641-8722 if this is not correct.)
Holding Company:
Registration Number (CORESID): **0037029717**
Management Company:
Headquarters Address:
 City: **8310 South Valley Highway**
 State: **Floor 3 Suite 3060**
 Englewood
 CO
 80112
Customer Inquiries Address:
 City: **8310 South Valley Highway**
 State: **Floor 3 Suite 3060**
 Englewood
 CO
 80112
Customer Inquiries Telephone: **844-571-8532**
Other Trade Names:

Agent for Service of Process:

D.C. Agent for Service of Process: **Kimberly Cupps**
Registered Agents Inc.
Telephone: **844-571-8532**
Extension:
Fax:
E-Mail: **kim@ulec.com**
Business Address of D.C. Agent for
Mail or Hand Service of Documents: **1717 N Street NW**
 City: **Suite 1**
 State: **Washington**
 DC
 20036

FCC Registration Information:

Chief Executive Officer: **Kimberly Cupps**
Business Address: **8310 South Valley Highway**
 City: **Floor 3 Suite 3060**
 Englewood
 CO
 80112

EXHIBIT B

B3. 911 Statement

ENHANCED 911 (E911) COMPLIANCE STATEMENT

ULEC

LLC

Application for Internet Protocol Enabled Service (IPES) Authorization

EXECUTIVE SUMMARY

ULEC LLC ("Company" or "ULEC") hereby submits this Enhanced 911 (E911) Compliance Statement in support of its application for Internet Protocol Enabled Service (IPES) authorization before the Federal Communications Commission ("FCC"). This document demonstrates ULEC's comprehensive approach to meeting all obligations under through certified E911 service provider partnership and mandatory customer location registration.

E911 SERVICE PROVIDER PARTNERSHIP

E911 Network

ULEC utilizes direct connectivity to Inteliquent Inc's E911 service provider network through a subsidiary to deliver emergency services connectivity for all VoIP customers.

Service Capabilities:

- E911 network with direct PSAP connectivity
- Automatic Location Identification (ALI) database management
- Master Street Address Guide (MSAG) validation services
- 24/7/365 emergency services network monitoring
- Redundant network architecture ensuring high availability

Technical Integration:

- Direct SIP trunk connectivity between ULEC's softswitch and Inteliquent's E911 network utilizing a subsidiary (anpi business llc), pathway via LCG
- Automated provisioning of customer location information to provider's database
- Real-time location updates and emergency call routing based on registered customer location at provider level

CUSTOMER LOCATION REGISTRATION REQUIREMENTS

Nomadic VoIP Service Compliance

ULEC provides nomadic VoIP services requiring mandatory location registration to ensure E911 compliance and emergency services accessibility.

Registration Process:

1. **Initial Service Activation:** All nomadic VoIP customers must provide and verify their primary service address during account setup
2. **Location Validation:** Customer addresses are validated against MSAG through 911 provider's validation services

3. **Database Provisioning:** Validated location information is automatically provisioned to the appropriate database
4. **Customer Portal Access:** Customers receive online portal access for location management

Location Update Requirements:

- Customers must maintain current and accurate location information
- Online customer portal provides real-time location update capability with MSAG validation
- 24/7 PSAP / ECRC routing for invalid location data

REGULATORY COMPLIANCE

FCC E911 Requirements

Service Delivery:

- All 911 calls routed to appropriate PSAP based on customer registered location
- Emergency call completion through national E911 service provider

Customer Notifications:

- Detailed E911 service explanation provided during service activation
- Clear communication of location registration importance and service limitations
- Notification that E911 service is tied to registered location for nomadic use
- Advisement to maintain alternative emergency communication methods when traveling

Technical Standards Compliance

- Direct connectivity to national E911 service provider
- Compliance with NENA standards for emergency services
- 24/7 monitoring of E911 service availability

QUALITY ASSURANCE AND MONITORING

Service Reliability

- Continuous monitoring of E911 service
- Regular testing of emergency call routing and delivery
- Automated alerting for service disruptions
- Redundant network paths for emergency call delivery

Compliance Management

- Quarterly review of E911 service provider performance
- Annual audit of customer location database accuracy
- Compliance with FCC E911 outage reporting requirements

- Regular customer communication regarding location registration importance

CUSTOMER EDUCATION AND SUPPORT

Ongoing Communication

- Comprehensive E911 service documentation provided to all customers
- Clear instructions for updating location information through customer portal
- 24/7 customer ECRC support for invalid address or caller id routing

CONCLUSION

ULEC LLC's E911 compliance framework, implemented through partnership with provider and mandatory customer location registration procedures, ensures full adherence to all FCC emergency services requirements. This approach addresses the unique challenges of nomadic VoIP services while maintaining reliable emergency services access and regulatory compliance.

EXHIBIT B

B4. CALEA Statement

COMMUNICATIONS ASSISTANCE FOR LAW ENFORCEMENT ACT (CALEA) COMPLIANCE STATEMENT

EXECUTIVE SUMMARY

ULEC LLC ("Company" or "ULEC") hereby submits this CALEA Compliance Statement in support of its application for Internet Protocol Enabled Service (IPES) authorization before the Federal Communications Commission ("FCC"). This document demonstrates ULEC's approach to meeting all obligations under the Communications Assistance for Law Enforcement Act, and applicable FCC regulations.

CALEA COMPLIANCE FRAMEWORK

ULEC has implemented a dual-layer CALEA compliance framework that ensures full adherence to all lawful intercept requirements through two complementary mechanisms:

1. UPSTREAM PROVIDER CALEA COMPLIANCE

ULEC's telecommunications services utilize interlata and intralata tandem providers that maintain full CALEA compliance capabilities. These upstream providers serve as the primary point of lawful intercept implementation for traffic traversing their networks.

Key Elements:

- All interlata tandem providers utilized by ULEC are CALEA-compliant telecommunications carriers
- All intralata tandem providers utilized by ULEC maintain appropriate lawful intercept capabilities
- Lawful intercept requests may be fulfilled directly at the tandem provider level for applicable traffic

2. NATIVE PLATFORM CALEA CAPABILITIES

ULEC's network infrastructure includes native CALEA compliance capabilities integrated into our core switching and routing platforms.

Technical Implementation:

- Router infrastructure with embedded CALEA functionality
- Softswitch platform with native lawful intercept capabilities
- Real-time lawful intercept delivery mechanisms
- Secure interfaces for law enforcement access
- Call detail record preservation and delivery systems

COMPLIANCE PROCEDURES

Lawful Intercept Request Processing

ULEC has established comprehensive procedures for processing lawful intercept requests:

1. **Receipt and Validation:** All CALEA requests are received through designated secure channels and validated for proper legal authorization
2. **Technical Implementation:** Intercepts are activated within required timeframes using appropriate technical methods as requested by the law enforcement agency
3. **Delivery:** Intercepted communications and call-identifying information are delivered to requesting agencies in compliance with applicable standards
4. **Documentation:** All intercept activities are properly documented and audited

Direct Compliance Commitment

ULEC commits to full compliance with all CALEA requests received directly by the Company. This includes:

- Immediate response to authorized lawful intercept orders
- Technical capability to intercept communications traversing ULEC's network
- Coordination with law enforcement agencies as required by applicable orders

Intercept Delivery Methods

ULEC maintains technical capability to deliver intercepted communications through multiple methods as required by law enforcement agencies:

- Real-time content delivery
- Call detail record provision
- Electronic delivery to law enforcement facilities
- Secure data transmission protocols

REGULATORY COMPLIANCE

FCC Requirements

ULEC acknowledges and commits to compliance with all applicable FCC CALEA requirements.

ONGOING COMPLIANCE ASSURANCE

Regular Review and Updates

ULEC maintains ongoing CALEA compliance through:

- Regular review of technical capabilities
- Updates to procedures based on regulatory changes
- Coordination with upstream providers on compliance status
- Employee training on CALEA requirements and procedures
- Quality assurance and testing

CONCLUSION

ULEC LLC's comprehensive CALEA compliance framework ensures full adherence to all lawful intercept obligations through both upstream provider capabilities and native platform functionality. The Company is committed to maintaining the highest standards of CALEA compliance and will respond promptly and completely to all properly authorized lawful intercept requests.

This dual-layer approach provides redundancy and ensures that ULEC can meet its CALEA obligations regardless of the specific technical path of communications traversing our network.

EXHIBIT C

Company Executive

Kimberly Cupps

Senior Telecommunications Executive | VoIP, Number Portability & Network Infrastructure

PROFESSIONAL EXPERIENCE

Ulec – President

April 2025 – Present

- ✓ Spearheading the strategic development and oversight of interconnection agreements and network architectures across multiple carriers.
- ✓ Designing and implementing VoIP management systems to streamline provisioning, routing, and monitoring functions.
- ✓ Leading negotiations and contracts for softswitch technology deployment to ensure scalable and resilient voice infrastructure.

- ✓ Licensed as a Responsible Organization (RespOrg) with Somos, enabling direct control of toll-free number routing and administration.
- ✓ Driving hiring strategies and overseeing cross-functional teams, including network engineers, support staff, and operations personnel.
- ✓ Ensuring regulatory compliance, including FCC requirements and telecom best practices.
- ✓ Building automation tools for DID provisioning and SIP trunk configuration.

[Commio – Director of Translations](#)

March 2021 – March 2023

- ✓ Directed the successful migration of Teli's complex number portability and translation systems into Commio's architecture.
- ✓ Oversaw LNP (Local Number Portability) processes for thousands of end-user numbers, ensuring minimal downtime and customer impact.
- ✓ Managed a cross-departmental team responsible for call routing translations and intercarrier connectivity.
- ✓ Enhanced system efficiencies by introducing API-driven porting procedures and real-time routing updates.
- ✓ Developed KPI tracking for routing accuracy and porting timelines to optimize operations.

[Teli Communications LLC – Vice President](#)

April 2017 – March 2021

- ✓ Directed CLEC licensing applications across multiple states, ensuring regulatory readiness for nationwide operations.
- ✓ Designed and deployed local number portability systems with real-time integration to Neustar APIs for rapid porting.
- ✓ Led cross-functional teams in network engineering, regulatory affairs, and customer provisioning.
- ✓ Played a critical role in establishing Teli's voice network infrastructure and its expansion to nationwide footprint.
- ✓ Developed disaster recovery strategies for routing and porting infrastructure.
- ✓ Initiated analytics dashboards to monitor porting throughput and call path efficiency.

[Onvoy LLC – Director of Translations](#)

June 2014 – March 2017

- ✓ Oversaw large-scale number portability operations for both local and toll-free services, supporting enterprise and wholesale clients.
- ✓ Implemented robust routing logic using industry-standard translation tools to improve call completion rates and reduce latency.

- Collaborated with engineering and product teams to improve internal LNP tools and streamline provisioning workflows.
- Standardized processes for managing customer ports, reducing fallout rates and rejections.

Vitility Communications LLC – Director of Translations

December 2011 – June 2014

- Architected systems for local and toll-free number portability, integrating with external carriers and third-party databases.
- Managed a team of support engineers and translation analysts, serving a customer base of over 20,000 end users.
- Created scalable workflows for handling high-volume porting requests and real-time call routing.
- Instrumental in onboarding enterprise clients by customizing call routing strategies and ensuring compliance with telecom standards.
- Improved system reliability by integrating monitoring tools and proactive alert systems.

TECHNICAL SKILLS

VoIP Technologies: SIP, RTP, DenovoLabs

Routing & Translations: LERG, Number Portability Administration Center (NPAC), LNP, Toll-Free Routing

Porting Systems: Neustar APIs, Somos RespOrg Tools

Network: Interconnection Management, SS7, IP Peering, Redundancy Planning

Tools & Platforms: Wireshark, SIP Debugging Tools, Custom Provisioning Systems
Regulatory & Compliance: CLEC Licensing, FCC Compliance, CPNI Regulations

CERTIFICATIONS & AFFILIATIONS

- Licensed RespOrg – Somos

Confidential EXHIBIT D

Confidential and Proprietary

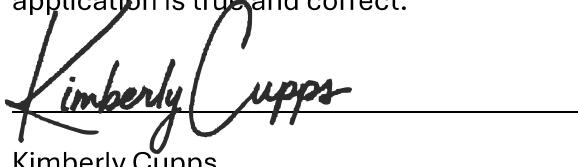
1. *Master Services Agreement: Wide Voice, LLC & ULEC, LLC*
2. *Exhibit 4: Provision of PSTN Network Hosting*
3. *Exhibit 1: PSTN Host LATA's for IPES Carriers / Footprint*

Exhibit E

OFFICER'S DECLARATION

I, Kimberly Cupps, President of ULEC LLC, declare under penalty of perjury pursuant to C.F.R. § 1.16 that the following is true and correct:

1. I am the Owner and President of ULEC LLC ("ULEC"). I have served in this role since its inception.
2. I have reviewed the foregoing Application of ULEC to Obtain FCC Authorization for Numbering Resources, and the exhibits thereto, and I am familiar with their contents.
3. To the best of my knowledge, information, and belief, the information set forth in the application is true and correct.



Kimberly Cupps

Executed on June 27, 2025

At:

8310 S Valley Hwy, S 3060
Centenial, CO. 80223