

APELA Professional Services, LLC
Complex Telecommunications Consulting
2525 W. Rock Quarry Rd
Buford, GA. 30519
Telephone: 404-519-4096

April 19, 2024

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

RE: Request for Confidential Treatment to the Application of Verification Technologies, LLC which transacts business under the name **Plura.ai**, 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, Verification Technologies, LLC; here forward known as ("Verification Technologies, LLC") hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

Verification Technologies, 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, Exhibits C&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. Verification Technologies, 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, Verification Technologies, LLC hereby states as follows:

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

Verification Technologies, LLC seeks confidential treatment of Exhibits C&D in its entirety.

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

Verification Technologies, LLC is submitting the confidential agreements between it and its ICA/CLEC partner as proof of Verification Technologies, LLC's 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 Verification Technologies, 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 Exhibits C&D consists of commercial agreements between Verification Technologies, LLC and its CLEC partner of which contain proprietary information concerning Verification Technologies, 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 Verification Technologies, LLC disadvantage. Verification Technologies, LLC has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by Verification Technologies, LLC could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to Verification Technologies, 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 Verification Technologies, LLC proprietary and commercial information to its detriment as they would gain access to sensitive data about how Verification Technologies, LLC provides services as well as about Verification Technologies, 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).

Verification Technologies, LLC has not distributed the information in Confidential Exhibit D to the public or any parties within Verification Technologies, LLC or outside Verification Technologies, 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).

Verification Technologies, 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).

Verification Technologies, 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 Exhibits C&D.

9. ADDITIONAL INFORMATION THAT Verification Technologies, 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 Verification Technologies, 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,

A handwritten signature in black ink, appearing to read "Ronald J Grob", is written over a horizontal line.

Ronald J Grob

APELA Professional Services, LLC

Senior Telecommunications Consultant To Verification Technologies, LLC

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

In the Matter of **Verification Technologies, LLC**) WC Docket No. 24- xxxxxx
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

**APPLICATION OF Verification Technologies, LLC FOR
AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, Verification Technologies, LLC which transacts business under the name Plura.ai ("Verification Technologies, LLC" or the "Company") a wholly owned subsidiary of [REDACTED] Redacted [REDACTED], 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. Verification Technologies, LLC hereby requests the Commission grant it such authorization. In support of this application, Verification Technologies, LLC provides the following information:

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

§ 52.15(g)(3)(i)(A)

Name: Verification Technologies, LLC, d/b/a Plura.ai
Street: 177 Cassia Way
Suite : B112
City: Henderson
State: NV
ZIP Code: 89014

Executives for Verification Technologies, LLC:
Name: Daniel McKeehan, CTO
Street: 177 Cassia Way
Suite : B112
City: Henderson
State: NV
ZIP Code: 89014

Name: Mathew Beucler, CEO
Street: 177 Cassia Way
Suite : B112
City: Henderson
State: NV
ZIP Code: 89014

General Counsel:
Seth D. Heyman, Esq.
Street: 5938 Priestly Drive
Suite : Suite 102
City: Carlsbad
State: CA
ZIP Code: 92008

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

Name: Ronald J. Grob, MISM
Street: 2525 W Rock Quarry Rd
Suite : Red Room
City: Buford
State: GA
ZIP Code: 30519
Email:rongrob@apelaprofsvcs.com

B. § 52.15(g)(3)(i)(B)

Verification Technologies, LLC 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. Verification Technologies, LLC intends to offer services immediately in Nevada, but seeks authority to access numbering resources throughout the United States.

C. § 52.15(g)(3)(i)(C)

Verification Technologies, LLC 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.

D. § 52.15(g)(3)(i)(D)

Verification Technologies, LLC authenticates its' capability to provide service within 60 days of the numbering resources activation date. 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. Verification Technologies, LLC has negotiated an Interconnect Agreement with Peerless (InfoBip), Inc. ("Peerless (InfoBip)"), a Competitive Local Exchange Carrier owned by InfoBip, to serve as Verification Technologies, LLC's access homing tandem provider. Peerless (InfoBip) will route and deliver all local and access traffic (both originating and terminating) to the PSTN for Verification Technologies, LLC. Verification Technologies, LLC will interconnect with and broadcast Peerless (InfoBip)'s tandem platforms for the purposes of managing all codes assigned to Verification Technologies, LLC OCNs. The Interconnect Agreement, which demonstrates the Company's access to the platform and capability of Peerless (InfoBip), is attached to this application as Confidential **Exhibit D**.

STIR/SHAKEN compliant

Verification Technologies, LLC has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and 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 their customers as required by STI-GA Authorities. In addition, Verification Technologies, LLC 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**

Spam/Robocall Mitigation and Blocking

Verification Technologies, LLC is committed to providing full support for their customers concerning Robocall Mitigation and call Blocking where appropriate. The Company certifies that it will not use the numbers obtained pursuant to 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).

E. § 52.15(g)(3)(i)(E)

- Verification Technologies, LLC 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. Verification Technologies, LLC's FRN and 499 filer ID are included in **Exhibit B.**

F. § 52.15(g)(3)(i)(F)

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. Verification Technologies, LLC's key management personnel are identified in attached **Exhibit C.** None of Verification Technologies, LLC 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.

G. § 52.15(g)(3)(i)(G)

Verification Technologies, LLC 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.

H. § 51.914

Verification Technologies, LLC hereby certifies that it complies with the Access Stimulation rules under § 51.914.

I. 911/988

Verification Technologies, LLC 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).

J. § 63.18(h) & (i)

Neither Verification Technologies, LLC nor its parent company **Redacted**, is affiliated with, a foreign carrier, or (b) has any interlocking directorates with a foreign carrier.

Verification Technologies, LLC is a wholly-owned subsidiary of (redacted as confidential) The **Redacted**, ("Ultimate Parent"), a corporation organized under the laws of the State of Nevada. The following are the only

individuals, each of whom is a citizen of the United States, that beneficially own 33.3 percent (33.3%) of the equity of the Ultimate Parent:

Redacted

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

As required by Section 52.15(g)(3)(iv), Verification Technologies, LLC 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. Verification Technologies, LLC 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, Verification Technologies, LLC, respectfully requests 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 Verification Technologies, LLC.

A handwritten signature in black ink, appearing to read "Ronald J Grob", written over a horizontal line.

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

Exhibit A

A1. RoboCall Mitigation Plan

Robocall Mitigation Statement

Verification Technologies, LLC is committed to detecting, avoiding, and blocking robo-dialed traffic. We follow industry best practices to enable our efforts. Verification Technologies, LLC is an intermediary carrier and hence our customers do not originate traffic on the Verification Technologies, LLC network. All Verification Technologies, LLCs' traffic is originated by small businesses and carriers on other networks and is transited to Verification Technologies, LLC already signed and "Attested". Verification Technologies, LLC passes the Token and Attestation level that is sent by the originating carrier.

Verification Technologies, LLC uses a multi-faceted approach in our mitigation strategy. These include:

1. We know our customers' businesses and monitor them closely:
 - a. Enterprise: We verify that the corporate entity and business purpose is legitimate.
 - b. Telecoms: We verify that telephone numbers are being legitimately used.
 - c. Use Case: Verify and educate customers regarding vertical, opt-in, and calling practices.
 - d. Identity: Validate and update CallerID, CNAM, & verified calls.
2. Stir/Shaken
 - a. We have updated our SIP software to allow the Stir and Shaken tokens/messages to be passed from the traffic originators to our traffic termination companies. We have completed the Stir/Shaken testing process and validated that all information is being passed correctly.
 - b. We partner with vendors that already implemented Stir/Shaken in their network or will have done so by June 2021.
3. Traceback/USTelecom
 - a. We actively participate in the Traceback community including the FCC, law enforcement and the industry traceback consortium.
 - b. We require all peering customers to be US based, have an active FRN and to be an FCC 499-A contributor.
4. Audit and monitoring
 - a. We constantly monitor traffic statistics and metrics such as CPS, ASR, ACD, failure type (SIP Q.850 codes). We have placed Call Blocking and Traffic auditing software in place to alert and block as much illegal robocalling as possible.
 - b. We take seriously all FCC Complaints. We investigate these diligently and work directly with customers to improve their behavior or remove them from our network if their call patterns do not improve.

At Verification Technologies, LLC we take Robo-call mitigation seriously. We believe our current practices put us in line with best in class practices; however we continuously look for ways to improve and stay abreast of new approaches to reduce Robo-calls.

Sincerely,

Daniel McKeehan, CTO

Daniel McKeehan,
Chief Technology Officer
Verification Technologies, LLC

EXHIBIT B

B1.FCC FRN

FCC Registration System

[Close Window](#)

Registration Detail

FRN: 0034486753
Registration Date: 11/14/2023 12:45:03 PM
Last Updated:
Entity Name: Verification Technologies, LLC
Entity Type: Private Sector , Limited Liability Corporation
Contact Organization: Verification Technologies
Contact Position: CEO
Contact Name: Seth D Heyman ESQ
Contact Address: 8 The Green Suite A Dover, DE 19901 United States
Contact Email: sdh
ContactPhone:
ContactFax:

B2. 499 Filer ID

FCC Form 499 Filer Database

DETAILED INFORMATION

 [Form 499 Filer 836631 RSS Feed](#)

Historical Data:

499 Filer ID Number:	836631
Registration Current as of:	4/3/2023
Legal Name of Reporting Entity:	Verification Technologies, LLC
Doing Business As:	Number Verifier
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):	0034486753
Management Company:	
Headquarters Address:	177 Cassia Way B112 Henderson NV 89014
City:	Henderson
State:	NV
ZIP Code:	89014
Customer Inquiries Address:	304 S. Jones Blvd Suite 1020 Las Vegas NV 89107
City:	Las Vegas
State:	NV
ZIP Code:	89107
Customer Inquiries Telephone:	702-262-9597 Ext:

EXHIBIT C

Company Executives

Matthew Beucler, Chief Executive Officer

Matthew Beucler is a seasoned professional with over two decades of leadership, innovation, and experience in the telecommunications and contact center industries. A graduate of Orange Coast College, Matthew is known for his expertise in contact center operations, telecommunications, marketing, and compliance. What sets him apart is an innate ability to synergize these domains, leading to innovative services that cater effectively to market demands.

Starting his career as a sales representative for Fax.com, he then moved on to call center management before achieving more prominent leadership roles in other organizations, first as Marketing Director for Mocan Media, and then VP of Sales and Marketing for Novca Networks.

In December of 2022, Matthew embarked on a new venture as co-founder and CEO of Verification Technologies, an innovative telecommunications solutions provider, where he has been responsible for overseeing every department and single-handedly established the company's sales and marketing channels; efforts which helped grow the company to an industry leader in 2023.

Embodying a hands-on approach and a visionary outlook, Matthew Beucler has emerged as an influential figure in the industry. With a deep understanding of market intricacies and a penchant for innovation, he continues to inspire and drive forward the narrative of excellence.

Daniel McKeehan, Chief Technology Officer

Daniel McKeehan brings over 20 years of experience in telecommunications technology to bear in his current role as CTO of Verification Technologies, where his diverse skill set, technical expertise, and leadership acumen make him an invaluable asset to the company.

In addition to an Associate of Science degree from Western Nevada College, Mr. McKeehan has earned a comprehensive array of certifications, including Cisco Certified Network Associate, AWS Certified Developer, Google Associate Cloud Engineer, VMWare Certified Associate, CompTIA A+, and CompTIA Security+, and is also an expert in multiple programming languages including C#, GO, NodeJS, Python, and Rust.

As CTO of Verification Technologies, Mr. McKeehan focuses on product development, data security, compliance, and project management. Prior to joining Verification Technologies, he served as the CEO of DMC Services, a company specializing in building gaming machines for the horse racing industry.

Seth D. Heyman, Esq., CFO and General Counsel

Seth D. Heyman is a seasoned business and marketing law attorney who brings more than 25 years of experience to his role as CFO and General Counsel of Verification Technologies.

After graduating from the University of Colorado, Mr. Heyman earned his law degree from the Arizona State University College of Law and was admitted to the State Bar of Arizona in 1995. Following several years as a litigation associate at Warnock, MacKinlay & Associates in Phoenix, he relocated to California after passing the California Bar Exam in January of 1998. He then served as corporate counsel for several dot.com companies in the San Francisco bay area before establishing his own firm, the Business Law Center, in 2003.

Over the course of the next decade, Mr. Heyman largely focused his efforts on the rapidly growing performance marketing industry, where he assisted hundreds of companies to successfully navigate a heavily regulated and highly litigious business environment. Mr. Heyman developed a high level of expertise in online, direct mail, TV, radio, telemarketing, and e-mail marketing laws, along with online promotions, Internet privacy rules, data protection regulations, and similar matters; experience which in 2017 led to the establishment of [REDACTED] Redacted [REDACTED], an industry-leading risk management and legal compliance company.

Confidential EXHIBIT D

Confidential and Proprietary

- C1. Wholesale Master Services Agreement**
- C2. PSTN Connect Service Schedule (Dedicated)**
- C3. Exhibit 1 - PSTN Connect Services**
- C4. Voice Termination Service Schedule**
- C5. Schedule A – Unique Codes**