

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

December 30, 2021

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

RE: Request for Confidential Treatment to Application of Number Sentry, 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, Number Sentry, LLC ; here forward known as ("Number Sentry, LLC") hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

Number Sentry, 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 C&D is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. Number Sentry, LLC respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibits C&D are 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, Number Sentry, LLC hereby states as follows:

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

Number Sentry, LLC seeks confidential treatment of Exhibits C&D in its entirety.

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

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

Number Sentry, LLC has not distributed the information in Confidential Exhibits C&D to the public or any parties within Number Sentry, LLC or outside Number Sentry, 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).**

Number Sentry, LLC deems the information in Exhibits C&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).**

Number Sentry, LLC requests that Confidential Exhibits C&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 NUMBER SENTRY, 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 Number Sentry, LLC's 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](mailto: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 Number Sentry, LLC

Robocall Mitigation Database					
Business Name	FCC Registration Number (FRN)	Previous Business Names	Business Address	Other DBA Name(s)	Foreign Voice Service Provider
Number Sentry, LLC	0031415474	None	3861 River Mansion Drive Peachtree Corners GA 30096	None	No

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

In the Matter of **Number Sentry, LLC.** ) WC Docket No. 20- \_\_\_\_\_  
 For Authorization to Obtain Numbering )  
 Resources Pursuant to Section 52.15(g) of )  
 The Commission's Rules )

**APPLICATION OF NUMBER SENTRY, LLC, .FOR AUTHORIZATION TO OBTAIN  
NUMBERING RESOURCES**

Number Sentry, LLC. ("Number Sentry"), pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, respectfully requests authorization to obtain numbering as described below.

Under the Commission's *Numbering Order*, an Interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon a 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. Number Sentry, LLC hereby requests the Commission grant it that authorization. In support of this application, Number Sentry, LLC provides the following information:

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

**A. § 52.15(g)(3)(i)(A)**

Name: Number Sentry, LLC.  
 Address: 3861 River Mansion Drive,  
 City: Peachtree Corners  
 State: GA  
 ZIP Code: 30096

Executive for Number Sentry, LLC:

Name: David King  
Address: 3861 River Mansion Drive,  
City: Peachtree Corners  
State: GA  
ZIP Code: 30096  
Phone:

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

Name: David King  
Address: 3861 River Mansion Drive  
City: Peachtree Corners  
State: Ga  
ZIP Code: 30096  
Phone:

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

Name: Ron Grob  
Email: [rongrob@aprlaprofsvcs.com](mailto:rongrob@aprlaprofsvcs.com)

**B. § 52.15(g)(3)(i)(B)**

Number Sentry, 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 industry guidelines and practices regarding numbering, as applicable to telecommunications carriers. Number Sentry, LLC intends to offer services immediately in Georgia \_but seeks authority to access numbering resources throughout the United States.

**C. § 52.15(g)(3)(i)(C)**

Number Sentry, 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)**

Number Sentry, LLC authenticates its' capability to provide service within 60 days of the numbering resources activation date. Number Sentry, LLC is a recently-established interconnected VoIP carrier providing voice and network services for small to medium

sized businesses located in the United States. The Company was founded by several highly experienced telecommunications professionals and in addition, has several highly skilled technical employees. Number Sentry, LLC has negotiated an Interconnect Agreement with Peerless Networks, a (CLEC) Competitive Local Exchange Carrier, to serve as Number Sentry, LLC's access homing tandem and to route local and access traffic (both originating and terminating) to the **PSTN**. Number Sentry, LLC will interconnect with and broadcast Peerless's tandem platforms for the purposes of managing all codes assigned to Number Sentry, LLC OCNs. The interconnect agreement demonstrating the access to the platform and capability (Peerless's Network) is attached to this application as Confidential **Exhibit C**.

**Number Sentry, LLC will be Stir & Shaken compliant** and provide protections for their customers as required by STI-GA Authorities, as well as call labeling and blocking via a "reputation database".

In addition, Peerless's interconnection to the PSTN through it's MSA/ICA with several LECs is included in **Exhibit D**. of this filing.

**E. § 52.15(g)(3)(i)(E)**

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

**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 telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services. Number Sentry, LLC's key management and technical personnel are identified in attached **Exhibit B**. None 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.

**G. § 52.15(g)(3)(i)(G)**

Number Sentry, 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.

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

As required by Section 52.15(g)(3)(iv), Number Sentry, 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. Number Sentry, 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, Number Sentry, LLC, respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted for Number Sentry, LLC, INC.

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

Ronald J Grob

Principal Telecommunications Consultant To: Number Sentry, LLC  
APELA Professional Services, INC.

# EXHIBIT A

Registration Detail	
FRN:	0031415474
Registration Date:	09/22/2021 11:04:00 AM
Last Updated:	
Business Name:	Number Sentry, LLC
Business Type:	Private Sector , Limited Liability Corporation
Contact Organization:	Number Sentry, LLC
Contact Position:	President
Contact Name:	Mr David A King

Filer Identification Information:	
499 Filer ID Number:	834849
Registration Current as of:	Apr 1 2021 12:00AM
Legal Name of Reporting Entity:	Number Sentry, LLC
Doing Business As:	Number Sentry, LLC
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):	0031415474
Management Company:	
Headquarters Address:	3861 River Mansion Drive
City:	Peachtree Corners
State:	GA
ZIP Code:	
Customer Inquiries Address:	3861 River Mansion Drive
City:	Peachtree Corners
State:	GA
ZIP Code:	

## Robocall Mitigation Database

Business Name	FCC Registration Number (FRN)	Previous Business Names	Business Address	Other DBA Name(s)	Foreign Voice Service Provider
Number Sentry, LLC	0031415474	None	3861 River Mansion Drive Peachtree Corners GA 30096	None	No



# **EXHIBIT B**

## **Key Managerial and Technical Personnel**

**President**  
David King

### **Sales**

Chief Sales Officer  
G. Todd Ward

Sales Development Representative  
Sorina Infante

### **Customer Care**

VP Customer Care  
vacant

Customer Service Representative  
Joshua King

### **Network Operations**

Telephony Services  
Mack Hendricks

Network Operations Center  
Courtney Griffith

### **Software Development**

Project Management  
Minah Joshi

Database & Backend Services  
Atul Gadede  
Shrinivas Kumbhar

Application Development  
Sunil Salunke  
Hrushikesh Wagh  
Suhas Bachewar

Quality Assurance  
Satish Mishra

# **Confidential Exhibit C**

## **Confidential and Proprietary**

- 1. Number Sentry, LLC, & Peerless Networks Inc. Interconnect Documents, Pursuant to 47 C.F.R. §0.459**
- 2. Number Sentry, LLC & Peerless Networks Inc. LocalTermDOD-Final – Confidential Pursuant to 47 C.F.R. §0.459**
- 3. Number Sentry, LLC & Peerless Networks Inc MSA Final – Confidential, Pursuant to 47 C.F.R. §0.459**
- 4. Number Sentry, LLC & Peerless Networks Inc PSTN Final – Confidential, Pursuant to 47 C.F.R. §0.459**
- 5. Number Sentry, LLC & Peerless Networks Inc Transit Final – Confidential, Pursuant to 47 C.F.R. §0.459**

# **Confidential EXHIBIT D**

**CLEC Agreement with:  
Peerless Network**

**INTERCONNECTION AND/OR RESALE AGREEMENT**

**General Terms and Conditions/AT&T-22STATE**