

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Mitel Cloud Solutions, Inc, Applicant ) WC Docket No. 20-\_\_  
For Authorization to Obtain Numbering Resources )  
Pursuant to Section 52.15(g) of )  
the Commission's Rules )

**VERIFIED APPLICATION OF MITEL CLOUD SOLUTIONS, INC. FOR INTERCONNECTED  
VOIP NUMBERING AUTHORIZATION**

Mitel Cloud Solutions, Inc. ("Mitel"), an existing provider of interconnected voice over internet protocol ("I-VoIP") service, files this application with the Federal Communications Commission ("Commission") for authorization to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (the "Numbering Administrators") pursuant to Commission Rule section 52.15(g)(3), 47 C.F.R. § 52.15(g)(3).

Mitel provides the following information in support of its application:

1. Section 52.15(g)(3)(i)(A). Mitel's address is 1146 N. Alma School Road, Mesa, AZ 85201 and its general corporate telephone number is 480-422-3639.

Contact for Regulatory Requirements, Compliance, 911 and Law Enforcement: Dave Deutsch, Senior Corporate Counsel, 4000 Innovation Drive, Kanata ON. K2K 3K1, phone at 613-383-1254, email [dave.deutsch@mitel.com](mailto:dave.deutsch@mitel.com).

2. Section 52.15(g)(3)(i)(B). Mitel acknowledges that grant of the authorization sought by this application is subject to compliance with applicable Commission numbering rules, numbering authority delegated to the States and industry guidelines and practices regarding numbering as applicable to telecommunications carriers.

3. Section 52.15(g)(i)(C). Mitel further acknowledges that it must file requests for numbers with the relevant State commissions at least thirty (30) days before requesting numbers from the Numbering Administrators.

4. Section 52.15(g)(i)(D). Mitel is capable of providing I-VoIP service within sixty (60) days of the numbering resources activation date in accordance with Commission Rule Section 52.15(g)(2)<sup>1</sup> because it owns and operates telecommunications systems for the provision of I-VoIP services, has provided I-VoIP services for several years and continues to provide those services at the present time. Mitel's I-VoIP services are provided on an over-the-top ("OTT") basis. In addition, Mitel has the ability to schedule and process Local Number Portability ("LNP") orders from customers, and has staff experienced in handling LNP requests between itself and other carriers and I-VoIP providers.

5. Section 52.15(g)(3)(i)(E). Mitel contributes to its Universal Service Fund ("USF") obligations under 47 C.F.R. Part 54, subpart H, its Telecommunications Relay Service ("TRS") contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii), its North American Numbering Plan ("NANP") and Local Number Portability Administration ("LNPA") contribution obligations under 47 C.F.R. §§ 52.17 and 52.32, its regulatory fees under 47 C.F.R. § 1.1154, and its 911 obligations under 47 C.F.R. Part 9.

6. 52.15(g)(3)(i)(F). Mitel 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, and has sufficient technical expertise and I-VoIP infrastructure in place to provide reliable service. Mitel's key management and technical personnel are:

Tarun Loomba, Chairman and President

Graham Bevington, Vice President

In addition, Mitel is a wholly owned subsidiary of Mitel Networks, Inc., a privately owned corporation with a website of [www.mitel.com](http://www.mitel.com). The Mitel family of companies has great depth in the

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<sup>1</sup> 47 C.F.R. § 52.15(g)(2).

telecommunications industry and offers extensive telecommunications business, technical and managerial expertise to Mitel.

7. Section 52.15(g)(3)(i)(G). 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.

8. Section 52.15(g)(3)(iv). Mitel expressly agrees to comply with the requirements of Section 52.15(g)(3)(iv).

Pursuant to Commission Rule Section 52.15(g)(3), Mitel respectfully requests the Commission authorize it to obtain numbering resources directly from the Numbering Administrators.

Respectfully submitted,

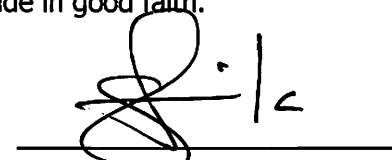
Mitel Cloud Solutions, Inc.  
By /s/ Jacqueline R. Neff

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Dated: May 19, 2020

## **VERIFICATION**

I, Gregory J. Hiscock, under penalty of perjury, state that I am Director of Mitel Cloud Solutions, Inc.; that in such capacity, I am qualified and authorized to verify this application; that I have carefully examined all the statements and matters contained in the application; that all such statements made and matters set forth therein are true and correct to the best of my knowledge, information and belief; and that the application is made in good faith.



Gregory J. Hiscock  
Director of Mitel Cloud Solutions, Inc.

Dated: May 19, 2020