

BEFORE THE FEDERAL COMMUNICATION COMMISSION

Washington, D.C. 20554

Application of Brightlink Communications, )  
LLC for Certification as a VOIP Provider ) WC Docket No. \_\_\_\_\_  
For Direct Access to Numbering Resources )  
Pursuant to Section 52.15(g)(3) of the )  
Commission's Rules, 47 C.F.R. §52.15(g)(3) )

**APPLICATION**

As set forth in the Federal Communication Commission's ("Commission") Numbering Order<sup>1</sup>, 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 Sections 52.15(g)(3)(i)(A)-(F).

Pursuant to 47 C.F.R. §52.15(g)(3), Brightlink Communications, LLC ("Brightlink") hereby files its application for Commission authorization to obtain telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator. In support of its Application, Brightlink, an Interconnected VoIP provider, by and through its counsel, submits the following.

**I. The Applicant's name, address, and telephone number, and contact information for personnel qualified to address issues relating to regulatory requirements, compliance with Commission rules, 911, and law enforcement.**

The Applicant is Brightlink Communications, LLC, with an address at 2859 Paces Ferry Road, Suite 1800, Atlanta, Georgia, 30339. The phone number for Brightlink is (404) 344-1122. Please direct all questions pertaining to Brightlink to Scott Allen, the Director of Regulatory

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<sup>1</sup> *Numbering Policies for Modern Communications*, FCC 15-70, 30 FCC Rcd 6839 (8). (rel. June 22, 2015.)

Affairs at Brightlink, or Anne Callenbach, counsel to Brightlink, available at [acallenbach@polsinelli.com](mailto:acallenbach@polsinelli.com) or (816) 572-4760.

- II. An acknowledgment that the authorization granted in this section of the rules 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.**

Brightlink acknowledges the above.

- III. An acknowledgement that the applicant must file requests for numbers with the relevant state commission(s) at least thirty (30) days before requesting numbers from the Numbering Administrators.**

Brightlink acknowledges the above.

- IV. Proof that the applicant is or will be capable of providing service within sixty (60) days of the numbering resources activation date in accordance with 47 CFR §52.15(g)(2).**

Brightlink currently provides these services today. In 2016, Brightlink acquired 365 Wireless, LLC and has integrated the staff and technology used to manage numbering resources from NANPA. The fact that Brightlink is currently providing these services demonstrates that it will be capable of providing the service within sixty (60) days of the numbering resources activation date pursuant to this application.

- V. Certification that the applicant complies 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, 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9.**

Brightlink is currently compliant with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H.

Brightlink is currently compliant with its Telecommunications Relay Service Contribution Obligations under 47 CFR § 64.604(c)(5)(iii).

Brightlink is currently compliant with its North American Numbering Plan and Local Portability Administration Contribution obligations under 47 CFR §§52.17 and 52.32.

Brightlink is currently compliant with its obligations to pay regulatory fees under 47 CFR §1.1154.

Brightlink is currently compliant with its 911 obligations under 47 CFR part 9.

**VI. Certification that the applicant possesses the financial, managerial, and technical expertise to provide reliable service. This certification must include the name of the applicant's key management and technical personnel, such as the Chief Operating Officer and the Chief Technology Officer, or equivalent, and state that none of the identified personnel are being or have been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.**

Brightlink possesses the financial, managerial, and technical expertise to provide reliable service, as evidenced by its 9 years in business, providing such services and the stability of its network. Brightlink has geo-redundant data centers and has made significant technology investments to ensure service reliability for its customers. Brightlink has not had an outage on its network since inception. Brightlink's key management and technical personnel are Joseph White, who currently holds the position of Chief Technology Officer and Phoua Xiong, who currently holds the position of Director of Operations. Neither Mr. White nor Ms. Xiong is, nor has been, investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

**VII. Certification pursuant to 47 §§ CFR 1.2001-1.2002 that no party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.**

No party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

**Conclusion**

Pursuant to Section 52.15(g)(3) of the Commission's Rules, Brightlink respectfully requests that the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,



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