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March 7, 2024

Via ECFS (Non-Docketed)

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L. Street, NE
Washington, D.C. 20554

**Re: Supplement to Application of Union Telephone Company
For Authorization to Obtain Numbering Resources**

Dear Ms. Dortch:

On behalf of Union Telephone Company (“UTC”), attached herewith is a certification to be associated with the referenced application.

Should you have any further questions, please contact myself at (703) 584-8673.

Respectfully Submitted,

Todd Slamowitz

Todd Slamowitz

CERTIFICATION

I, Alan Hinman, certify under penalty of perjury that the foregoing is true and correct:

1. I am the Network Engineer of Union Telephone Company ("Union").
2. I have personal knowledge of the facts and information set forth in Union's Application for Authorization to Obtain Numbering Resources (the "Application") filed on September 11, 2023, and I am competent to testify to these facts if called as a witness.
3. Union understands that it must demonstrate that it is "capable of providing service within sixty (60) days of the numbering resources activation date it must demonstrate proof of facilities readiness as part of the Application..." 47 C.F.R. 52.15(g)(3)(ii)(H). Such proof of facilities readiness must include all third-party agreements.
4. Union is a facilities-based local exchange carrier (LEC) that operates in the LATA and state where it is seeking numbering resources. Union currently serves most of its customers POTS lines using VoIP (SIP and RTP) to customer premise PON nodes or via DLAMs in the various LEC exchanges. Connection to the PSTN for POTS services is then provided via Union's Meta (Microsoft) IMS core using the included media gateway. Union IPES services would use Union's LEC infrastructure to connect to the PSTN. All connectivity is already in place and Union already uses SIP/RTP in the same manner (e.g. via Union's Meta (Microsoft) IMS core) to serve its corporate POTS services in non-union exchange areas.
5. The Union customers that are not being served by the Meta (Microsoft) IMS core are still served being served by its legacy Nortel DMS100 infrastructure.
6. Union does not have an interconnection agreement or any agreement with a third party that is necessary for them to provide interconnected VoIP service.

Executed on March 7, 2024



Alan Hinman
Network Engineer
Union Telephone Company