

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

*In the Matter of* )  
Union Telephone Company ) WC Docket No. 23-\_\_\_\_\_  
For Authorization to Obtain Numbering )  
Resources Pursuant to Section 52.15(g) of )  
The Commission's Rules )

**APPLICATION OF UNION TELEPHONE COMPANY FOR AUTHORIZATION  
TO OBTAIN NUMBERING RESOURCES**

Union Telephone Company (“UTC”), pursuant to Section 52.15(g)(3)(i) of the Commission’s rules, respectfully requests authorization to obtain numbering resources as described below.

As set forth in the Commission’s *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) of the Commission’s Rules. UTC, a long-standing Commission licensee that provides both local exchange and wireless telecommunications services and who is seeking to expand its service offerings by providing interconnected VoIP service within its current wireless, CAF-II, and ACAM service areas, hereby requests the Commission grant it that authorization. In support of this application, UTC provides the following information.

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<sup>1</sup> *Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd. 6839 (2015).

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

**(A) § 52.15(g)(3)(i)(A)**

**Name:** Union Telephone Company

**Address:** 850 N. Highway 414  
Mountain View, WY 82939

**Telephone:** 307-782-6131

**Qualified Personnel:**

Eric Woody
Chief Executive Officer
Brian Woody
Chief Customer Relations Officer

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

**Name:** Eric Woody

**Address:** 850 N. Highway 414  
Mountain View, WY 82939

**Telephone:** 307-782-6131

**Email:** [ewoody@unionwireless.com](mailto:ewoody@unionwireless.com)

**(B) § 52.15(g)(3)(i)(B)**

UTC 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. UTC hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers.

**(C) § 52.15(g)(3)(i)(C)**

UTC hereby 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)**

UTC hereby sets forth its capability to provide service within 60 days of the numbering resources activation date.

UTC plans to provide VoIP services in Wyoming using its own facilities including routing its traffic to the PSTN.<sup>2</sup> UTC will be able to begin placing numbers into service almost immediately and, in any event, within sixty (60) days of the numbering resources activation date. As further proof of its facilities readiness, UTC is a long-standing facilities-based provider offering local exchange service covering 7,400 square miles in Wyoming, Utah, and Colorado. UTC also provides wireless service, which covers over 122,000 square miles across Wyoming and parts of Colorado, Idaho, Montana, and Utah.

**(E) § 52.15(g)(3)(i)(E)**

UTC hereby certifies that it 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 and 52.32 its obligations to pay regulatory fees under 47 CFR § 1.1154; and its 911 obligations under 47 CFR part 9.

**(F) § 52.15(g)(3)(i)(F)**

UTC hereby certifies that it has the financial, managerial, and technical expertise to provide reliable service. We reiterate that UTC is a long-standing family-owned facilities-based carrier that offers both local exchange and wireless services in predominantly rural areas of the United States. It's led by a strong, experienced management team with substantial managerial experience in the telecommunications industry and has sufficient technical expertise and existing infrastructure in place to provide reliable numbering and related VoIP services.

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<sup>2</sup> UTC is also seeking numbering blocks to assign local routing numbers and local numbers for use in the Lumen, Wyoming exchange area only.

UTC has the superior technical qualifications necessary to provide and maintain successful operations within its existing service area. UTC has the capabilities to efficiently port and place numbers into service and successfully route calls.

UTC's key management and technical personnel are listed below. None of the identified personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

**Key Personnel:**

Eric Woody: Mr. Woody is UTC's Chief Executive Officer. A veteran of the U.S. Navy, he has a B.S. in Electrical Engineering and has been working at UTC since 1997.

Brian Woody: Mr. Woody is UTC's Chief Customer Relations Officer. He has a B.S. in Electrical Engineering and has been working at UTC since 2001. His expertise is technology, marketing, and customer relations.

Alan Hinman: Mr. Hinman is a network engineer. He has a B.S. in Computer Science, a B.S. in Electrical Engineering, is an inactive Professional Engineer (WY PE#11065 electrical/inactive) and has been working for Union Wireless Since 1994. His expertise is in routing, switching, transport networks, wireless telephony and wireline telephony.

Lehi Hazen: Mr. Hazen is a network engineer. He has a B.S. in Electrical Engineering and has been working at UTC since 2017. His expertise is in routing, switching, transport networks, and project engineering.

**(G) § 52.15(g)(3)(i)(G)**

UTC 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), UTC 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. UTC 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, UTC respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

*Todd Slamowitz*

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