

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

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In the Matter of)
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ELECTRIC LIGHTWAVE, LLC D/B/A)
ALLSTREAM)
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For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

SUPPLEMENT TO THE APPLICATION OF ELECTRIC LIGHTWAVE, LLC
D/B/A ALLSTREAM FOR AUTHORIZATION TO OBTAIN NUMBERING
RESOURCES

On May 29, 2018, Electric Lightwave, LLC d/b/a Allstream (“Allstream”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requested authorization to obtain numbering resources as an interconnected VoIP provider.

In response to the application, the Wireline Competition Bureau requested additional information to demonstrate proof of facilities readiness under Direct Access Order (FCC 15-70) paragraph 37. In support of this application, Allstream provides the following information:

I. Proof of Facilities Readiness

Allstream the interconnected VoIP provider will be partnering with the CLEC Electric Lightwave, LLC dba Allstream.

Below is an example of interconnection agreements Electric Lightwave, LLC has with the relevant LECs.

State	ILEC	Link to Interconnection Agreement
Arizona	CenturyLink QC (former Qwest)	http://docket.images.azcc.gov/0000041453.pdf
California	AT&T Pacific Bell	Search “Electric Lightwave”
Idaho	CenturyLink QC (former Qwest)	http://www.puc.idaho.gov/fileroom/cases/summary/USWT0021.html
Nevada	AT&T Nevada Bell	http://pucweb1.state.nv.us/PUC2/DktDetail.aspx
Oregon	CenturyLink CQ (former Qwest)	https://apps.puc.state.or.us/edockets/docket.asp?DocketID=10078
Utah	CenturyLink QC (former Qwest)	https://psc.utah.gov/2016/07/01/docket-no-13-049-32/
Washington	CenturyLink CQ (former Qwest)	https://www.utc.wa.gov/docs/Pages/CompanyNameBrowser.aspx

II. List of States in which Allstream is planning on providing iVoIP

Allstream initially intends to provide service in Arizona, California, Idaho, Nevada, Oregon, Utah and Washington.

III. Percent of Foreign Ownership

Zayo Group, LLC owns 100% of Allstream Business US, LLC which owns 100% of Electric Lightwave, LLC. The parent to Zayo Group is Zayo Group Holdings, Inc. (“Zayo”), a publicly traded company. Proxy statements filed by the company with the SEC show beneficial ownership of the company. Zayo has only one owner, Dodge & Cox with 10% or greater ownership (10.0% as of March 31, 2018).¹ Dodge & Cox is a operates investment funds that are offered for sale only in the United States.²

¹ DEF 14A Proxy Statement (definitive), 9/27/2018 (<http://otp.investis.com/clients/us/zayo1/SEC/sec-show.aspx?FilingId=12979981&Cik=0001608249&Type=PDF&hasPdf=1>).

² See https://www.dodgeandcox.com/investor_resources.asp.

IV. Conclusion

Allstream respectfully submits this additional information.

Respectfully submitted,



By: _____

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