

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

In the Matter of)
)
AT&T Corp., Applicant) **WC Docket No. 16-_____**
)
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
the Commission's Rules)

**APPLICATION OF AT&T CORP. FOR
AUTHORIZATION FOR NUMBER AUTHORIZATION**

AT&T Corp. (“AT&T”), a current provider of interconnected voice over internet protocol (“iVoIP”) service, files this application with the Federal Communications Commission (the “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).¹ AT&T provides the following information in support of its application:

1. Company Information. AT&T’s address is One AT&T Way, Bedminster, NJ 07921. AT&T does not have a general corporate telephone number. For purposes of this application, inquiries pertaining to issues associated with 9-1-1, law enforcement, and general compliance with Commission rules can be directed to Joseph P. Marx, 1120 20th Street NW, Washington, DC 20036, 202-457-2107.

2. Acknowledgements. AT&T acknowledges that:

- a. 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

¹ 47 C.F.R. § 52.15(g)(3).

carriers; and

- b. it must file requests for numbers with the relevant State commissions at least thirty (30) days before requesting numbers from the Numbering Administrators.

3. Service Readiness.

- a. AT&T is capable of providing iVoIP service within sixty (60) days of the numbering resources activation date in accordance with Commission Rule Section 52.15(g)(2)² because it has provided iVoIP business services for over ten (10) years and continues to provide those services currently. AT&T's iVoIP portfolio includes AT&T IP Flexible Reach, AT&T Voice DNA® and AT&T Voice DNA® Remote Worker, AT&T Voice DNA® for Small Business, AT&T IP Toll-Free (AT&T IPTF), Hosted Voice Services (HVS), and Voice Connection. These services are described in the AT&T Business Voice over IP Services Guide, which can be accessed at

http://serviceguidenew.att.com/sg_CustomPreviewer?attachmentId=00P1A00000pFEDNUA4.

AT&T contributes to the Universal Services Fund (“USF”) and Telecommunications Relay Services Fund (“TRSF”) due to its provision of these services, which are offered over multiple sales channels, including via the web at <http://resources.att.com/ip-networking>.

- b. AT&T currently acquires numbers from an affiliate. Authorization sought in this application would allow AT&T to acquire numbers directly from the Numbering Administrators and the flexibility to use those numbers for its iVoIP business customers. AT&T would also use the acquired numbers within sixty (60) days of authorization for customers of U-verse iVoIP services offered by an AT&T affiliate. U-verse iVoIP service numbers were previously acquired

² 47 C.F.R. § 52.15(g)(2).

by AT&T's affiliate, SBC Internet Services ("SBC-IS"), via a Commission waiver,³ which expired on the effective date of the rules adopted in the Commission's VoIP numbering Report and Order.⁴ SBC-IS will be merged into AT&T, after which AT&T will hold the operating company number ("OCN") previously used by SBC-IS to acquire numbers directly from the Numbering Administrators pursuant to the Commission waiver. AT&T will use this OCN to acquire numbers.

4. Certifications. AT&T certifies to the following, supported by the attached certification of James F. Dionne, AT&T's Assistant Vice President—Accounting:

a. AT&T complies with its USF contribution obligations under Commission Rule Part 54,⁵ its TRSF contribution obligations under Commission Rule Section 64.604(c)(5)(iii),⁶ its NANP and LNP administration contribution obligations under Commission Rule Sections 52.17 and 52.32,⁷ its obligations to pay regulatory fees under Commission Rule Section 1.1154,⁸ and its 911 obligations under Commission Rule Part 9.⁹

b. AT&T possesses the financial, managerial, and technical expertise to provide reliable iVoIP service. Key management and technical personnel include, among others:

³ See *Administration of the North American Numbering Plan*, CC Docket No. 99-200, Order, 20 FCC Rcd 2957 (2005).

⁴ See *Numbering Policies for Modern Communications, et al*, WC Docket No. 13-97, Report and Order, 30 FCC Rcd 6839, 6876 n. 269 (2015).

⁵ 47 C.F.R. Part 54, Subpart H.

⁶ 47 C.F.R. § 64.604(c)(5)(iii).

⁷ 47 C.F.R. §§ 52.17, 52.32.

⁸ 47 C.F.R. § 1.1154.

⁹ 47 C.F.R. Part 9.

Richard Hubbard	Senior VP - Networking Product Management
Veronica Bloodworth	Senior VP - Construction and Engineering
Juan Flores	Senior VP - Technology Mgmt and Operations
Scott Mair	Senior VP - Technology Planning and Engineering
James F. Dionne	Assistant Vice President – Accounting

None of these 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.

c. No party to the application, as defined in Commission rule section 1.2001(b), is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

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

April 15, 2016

Respectfully submitted,



Robert Vitanza
Gary L. Phillips
David Lawson

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(214) 757-3357 (Phone)
(214) 746-2213 (Fax)
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Certification of James F. Dionne

I certify as follows:

1. My name is James F. Dionne. My title is Assistant Vice President – Accounting, AT&T Corp. I have responsibility for meeting AT&T's external financial reporting requirements to the Federal Communications Commission ("FCC"), to the Universal Service Administrative Company ("USAC"), and to each of the state regulatory commissions on behalf of AT&T and its other regulated affiliates. Further, I am responsible for the books and records for each of the domestic AT&T Corp. regulated legal entities, managing the AT&T Regional Bell Operating Company and AT&T Corp. affiliate billing processes, and performing data collection for certain network and marketing cost allocation processes. My current office address is Room 3B119, One AT&T Way, Bedminster, New Jersey 07921.

2. AT&T provides interconnected VoIP service, including AT&T IP Flexible Reach, AT&T Voice DNA® and AT&T Voice DNA® Remote Worker, AT&T Voice DNA® for Small Business, AT&T IP Toll-Free (AT&T IPTF), Hosted Voice Services (HVS), and Voice Connection. The AT&T Business Voice over IP Services Guide can be accessed at http://serviceguidenew.att.com/sg_CustomPreviewer?attachmentId=00P1A00000o9mxcUAA. AT&T offers its VoIP service over multiple sales channels, including via the web at <http://resources.att.com/ip-networking>. Numbers acquired pursuant to an authorization sought by this application would be put into use within sixty (60) days.

3. AT&T complies with its Universal Service Fund contribution obligations under 47 C.F.R. Part 54, Subpart H, its Telecommunications Relay Service contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii), its NANP and LNP administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32, its obligations to pay regulatory fees under 47 C.F.R. § 1.1154, and its 911 obligations under 47 C.F.R. Part 9.

4. AT&T possesses the financial, managerial, and technical expertise to provide reliable interconnected VoIP service. Key management and technical personnel include, among others:

Richard Hubbard	Senior VP - Networking Product Management
Veronica Bloodworth	Senior VP - Construction and Engineering
Juan Flores	Senior VP - Technology Mgmt and Operations
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James F. Dionne	Assistant Vice President – Accounting

None of these 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.

4. No party to the application, as defined in Commission rule section 1.2001(b), is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

The foregoing is true and correct based upon my personal knowledge, review of corporate and business records, and information provided to me by persons knowledgeable about AT&T and its operations.

Executed on April 13, 2016.



James F. Dionne