

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

**Public Version –
Confidential Not
Information Included**

In the Matter of Star2Star Communications, LLC) WC Docket No. 20- _____
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

APPLICATION OF STAR2STAR COMMUNICATIONS, LLC

FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES

Star2Star Communications, LLC (“Star2Star” or “Company”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requests authorization to obtain numbering as described below.

Under the Commission's *Numbering Order*,¹ 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 Section 52.15 (g)(3)(i)(A)-(G) of the Commission’s Rules. Star2Star hereby requests the Commission grant it that authorization. In support of this Application, Star2Star provides the following information:

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

A. § 52.15(g)(3)(i)(A)

Star2Star Communications, LLC
600 Tallevast Road, Suite 202
Sarasota, FL 34243
Telephone: (941) 234-0001
Facsimile: (941) 355-7878
Website: www.star2star.com

¹ *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015).

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

Star2Star Communications, LLC
Attention: Legal Department
600 Tallevast Road, Suite 202
Sarasota, FL 34243
Telephone: (941) 243-0001
Facsimile: (941) 355-7878
E-Mail: Legal@Star2Star.com

B. § 52.15(g)(3)(i)(B)

Star2Star 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. The Company hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers. The numbering resources that are the subject of this Application will be used to provide interconnected VoIP services initially in Florida, however the Company anticipates that it will provide interconnected VoIP service nationwide, and accordingly, will request numbers from the other states in turn after its initial request in Florida. Accordingly, to the extent required, Star2Star requests the Commission grant it authority to obtain numbering resources in all states.

C. § 52.15(g)(3)(i)(C)

Star2Star 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)

Star2Star hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. Star2Star has an agreement in place with a nationally recognized carrier partner, which has interconnection agreements in effect with all relevant incumbent local exchange carriers, in order to route traffic. A copy of this agreement is attached as ***Exhibit A*** to this Application. Star2Star respectfully requests this agreement be accorded confidential treatment, pursuant to §0.459 of

the Commission's rules.² As ***Exhibit B***, Star2Star provides a current interconnection agreement between its carrier partner and an incumbent local exchange carrier ("ILEC").

In addition, the Company has a back-office support system with the ability to schedule and process LNP orders from customers, and has staff experienced in handling Local Number Portability between itself and other carriers and interconnected VoIP providers.

E. § 52.15(g)(3)(i)(E)

Star2Star hereby certifies that it will comply 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 9.³

F. § 52.15(g)(3)(i)(F)

The Company certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, led by a strong, experienced management team with substantial managerial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable service.

Star2Star's key management and technical personnel are listed below, and more information concerning the managerial and team is included in ***Exhibit C***. None of the identified 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. A copy of Star2Star's corporate structure is attached as ***Exhibit D***.

G. § 52.15(g)(3)(i)(G)

Star2Star 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.

² 47 C.F.R. § 0.459. The agreement contains trade secret information that is not publicly available, the disclosure of which would cause economic harm to Star2Star.

³ Star2Star's 499 Filer ID is 827907. Star2Star is also an active provider of services to Schools and Libraries through the E-Rate program and services to health care providers through the Rural Health Care Program.

II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)

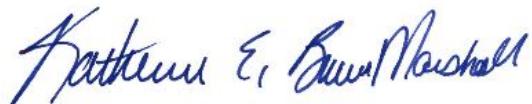
As required by Section 52.15(g)(3)(iv), Star2Star will maintain the accuracy of all contact information and certifications in this Application, and will file a correction with the Commission and each applicable state within 30 days of any changes. Star2Star will also furnish accurate regulatory and numbering 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, Star2Star Communications, LLC respectfully requests the Commission grant this Application for authorization to obtain numbering resources.

Respectfully submitted,

STAR2STAR COMMUNICATIONS, LLC



Katherine E. Barker Marshall
Potomac Law Group, PLLC
1300 Pennsylvania Ave NW, Suite 700
Washington, DC 20004
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E-mail: kmarshall@potomaclaw.com

Date: June 8, 2020

Exhibit A
Agreement with Underlying CLEC

Confidential and Proprietary – Filed Under Seal
Pursuant to 47 C.F.R. §0.459

A copy of the Agreement is filed under seal.

Exhibit B

Interconnection Agreements

Confidential and Proprietary – Filed Under Seal

Pursuant to 47 C.F.R. §0.459

Star2Star Communications, LLC hereby submits copies of its underlying carrier's interconnection agreement, filed under seal.

Exhibit C

Managerial Information

Star2Star's key management and technical personnel are listed below. None of the identified 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.

NORMAN WORTHINGTON **Chief Executive Officer and Executive Chairman**

Norman Worthington is a serial entrepreneur/investor and founder or co-founder of more than a dozen companies. One of Norman's earliest ventures was Software Toolworks, one of the first highly successful consumer software companies. Several of the original Software Toolworks titles are among the all-time best-selling products in their categories, including Mavis Beacon Teaches Typing! and the Chessmaster series. These titles are still available today, and each has sold tens of millions of copies. Software Toolworks became a public company in the early 90s and was subsequently purchased and taken private. It was acquired by Mattel in 1999.

In 1993, Norman entered a joint venture with Computer Associates (CA), the world's 4th largest software company. The joint venture developed and successfully launched the world's first Enterprise Application Integration system. This product, called Opal, integrated the back office systems of Fortune 1000 companies and made the information accessible over the Internet. It was used by Wal-Mart, among many others, as the backbone of their hugely successful supply-chain extension strategy in the late 90s. Opal was the featured product of CA's 1995 annual report. In 1996, CA purchased Norman's interest in the joint venture.

Norman received his bachelor of arts from New College of Florida and a law degree from Northwestern School of Law, Lewis & Clark College. Since 1997, he has acted as investor, advisor and board member for many technology-based startup companies.

MICHELLE ACCARDI **President and Chief Revenue Officer**

As President and Chief Revenue Officer, Michelle's mission is to inspire and maintain growth for the company and its partners and ensure that customers get significant value from Star2Star's products and services. Michelle works with the executive leadership team of Star2Star to define long-term vision and operational strategy to assure that growth and market potential are achieved.

In pursuit of this goal, Michelle sees as a primary function of her role to engage and listen to employees, partners, and customers to gather information needed to keep Star2Star on the optimal strategic path. In this way, customer success is assured as employees and partners are inspired to deliver an excellent product and experience with every interaction.

In her previous position as the company's Chief Operating Officer, Michelle used these same methods to develop new processes and systems to streamline business interactions. She grew departmental leadership and expanded Star2Star's support capabilities to better serve customer and partner needs.

Michelle is also regarded as a technical thought leader on next-generation marketing and communications strategies. Her book, Agile Marketing, chronicles her experiences applying agile methodology to the marketing process for better results and faster time to value. She brought her substantial executive-level and tech industry experience with her to Star2Star, having driven innovative, agile, revenue-producing field and channel marketing programs for one of the world's most relied upon technology companies, Computer Associates.

In 2016, Michelle was named to the CRN 2016 Power 100 – an elite subset of CRN's prestigious annual Women of the Channel list – for the second year in a row. In 2015, she was named a CRN Channel Chief, an annual list representing select leaders in the IT channel who hold direct responsibility for driving growth and revenue through the reseller channel. In 2014, Michelle was honored to be named Businesswoman of the Year by the Tampa Bay Business Journal.

Michelle holds an MBA from American Intercontinental University and earned her bachelor's degree from the University of South Florida.

SERGEY GALCHENKO
Chief Technology Officer

Sergey Galchenko brings to Star2Star over fifteen years of executive level experience in VoIP technology companies. Sergey was a key technology leader in two successful VoIP startups, and spent the last two years in a corporate environment. Sergey brings to the table a wide range of hands-on experience in VoIP, networking and enterprise technologies, as well as an expertise in business process design and improvement. In the past, Sergey has served as the Director of Technology for Jo-Ann Stores, Inc., CTO at Broadvox, and Manager of Network Design and Planning at Nexbell. Sergey has an MBA from Myers University and a Masters in Computer Science from Don State Technical University.

BOBBY MOHANTY
Chief Product Officer

Bobby is a visionary and entrepreneurial product leader bringing over 20 years of experience in creating and launching communication, collaboration, and integration technologies across many industry verticals. As Chief Product Officer, Bobby is responsible for driving product strategy, roadmaps, and innovation to ensure sustained long-term growth.

Prior to joining Star2Star, Bobby most recently served a second term as SVP & GM of Products at Vertical Communications, after a successful 7-year first term as VP of Engineering and Product Management. At Vertical, Bobby oversaw Vertical's product vision, strategy, and go-to-market, and was instrumental in conceptualizing and launching Vertical's flagship Unified Communication platform (Wave IP), award winning UC Application (ViewPoint), and industry winning vertical market solutions.

In his earlier roles, Bobby served as Sr. Director of Product Management at Avaya where he was responsible for driving Avaya's UC Application portfolio, co-founded and served as VP of Engineering at ipSEAL which provided service solutions to telecom carriers, and also served as Director of Engineering at Frontier Communications (later acquired by Global Crossings) where he was instrumental in launching their VoIP products including the first Carrier VoIP backbone in the US.

Bobby earned a Bachelor of Science degree in Electrical Engineering from the University of North Carolina at Charlotte.

BRUCE ILLES
Chief Legal Officer

Bruce Illes brings over 25 years of experience to Star2Star. Bruce started his legal practice in Cleveland, Ohio representing small and medium sized businesses and entrepreneurs. During that time Bruce represented several developers and other real estate entrepreneurs. He also represented an international company based in New Delhi, India in the acquisition of several U.S.-based businesses. Other interesting transactions from his years in private practice included the sale of a genuine Antonio Stradivari violin played by a member of the Cleveland Orchestra and the leasing of recently retired NASCAR race cars for use by a driving school. In 2003, during his last year of private practice, Bruce was named an Ohio Super Lawyer by Super Lawyers magazine.

Bruce relocated to Florida in 2004 to join a regional commercial construction and development firm. As general counsel he was responsible for all construction and development related diligence and contract documents, authoring in excess of \$250M in contracts.

Since joining Star2Star in mid-2011, Bruce has become involved in all aspects of the Company's business and corporate governance. He has been intimately involved in the documents for our channel partners and most recently has been involved in the extensive revision of the subscriber agreement and channel partner agreements related to our new 3.0 pricing structure. In addition to our sales-related documents, Bruce touches almost everything legal for the Company, from vendor contracts and carrier agreements, to employment related matters, defending intellectual property rights, and internal governance documents.

Bruce has a degree in Business Management from Kent State University and a Juris Doctorate from Cleveland-Marshall College of Law. Bruce holds a law license in both Florida and Ohio.

GRAHAM D. POTTER
Chief Knowledge Officer

Graham D. Potter's responsibilities cut across virtually all of Star2Star's business operations. Graham is responsible for the product release management process within the company, including competitive analysis, product planning, positioning, branding and product launches. He is the creator of Star2Star's acclaimed training program, as well as the majority of the company's user guides, how-to guides, and video tutorials. Graham brings extensive traditional telecom expertise and understanding to Star2Star.

A native of the UK, Graham has more than 40 years' experience delivering exemplary service and support to customers and technology partners around the globe. He has led highly effective service organizations for such companies as British Telecom, Aspect Telecommunications, SDX Business Systems (acquired by Lucent/Avaya), and Rockwell FirstPoint Contact. During his tenure leading the customer service organization at Rockwell, his team won awards from Pelorus Research and Contact Center World as a global winner of Best After Sales Service.

DAVID PORTNOWITZ
Chief Marketing Officer

As a 14-year marketing executive, David Portnowitz leads Star2Star's creative, digital, and co-op marketing efforts as well as the Training team. David has spearheaded Star2Star's efforts to enhance Star2Star's marketing team which serves and responds to partners and customers. Under his leadership, the Star2Star Marketing team has been able to operate as an in-house agency for over 500 Partners in all verticals, delivering personalized service and customized materials for a variety of projects. The team also works with the Training & Sales departments to deliver more unified Partner enablement tools and collateral. Prior to handling Star2Star's business-to-business marketing needs, David worked in business-to-customer marketing at IMG Performance, a division of IMG Worldwide, where he was the Senior Manager of Digital Media. In this role, David started and led the digital marketing efforts which transformed how the company did business online. He was also responsible for the marketing of several of their product lines and launched their robust social media presence.

Originally from Palm Bay, Florida, David moved to Sarasota in 2006 after earning a Masters of Science in Sports Management from the University of Florida, where he also earned his undergraduate degree. Throughout his career David has incorporated the essential lessons sports impart, such as leadership, team work, and accountability, into his life and work. He applies that knowledge daily in pursuit of new synergies between technology, media, and people.

WILLIAM M. ROGERS
Member of the Board of Directors and Government Contract Officer

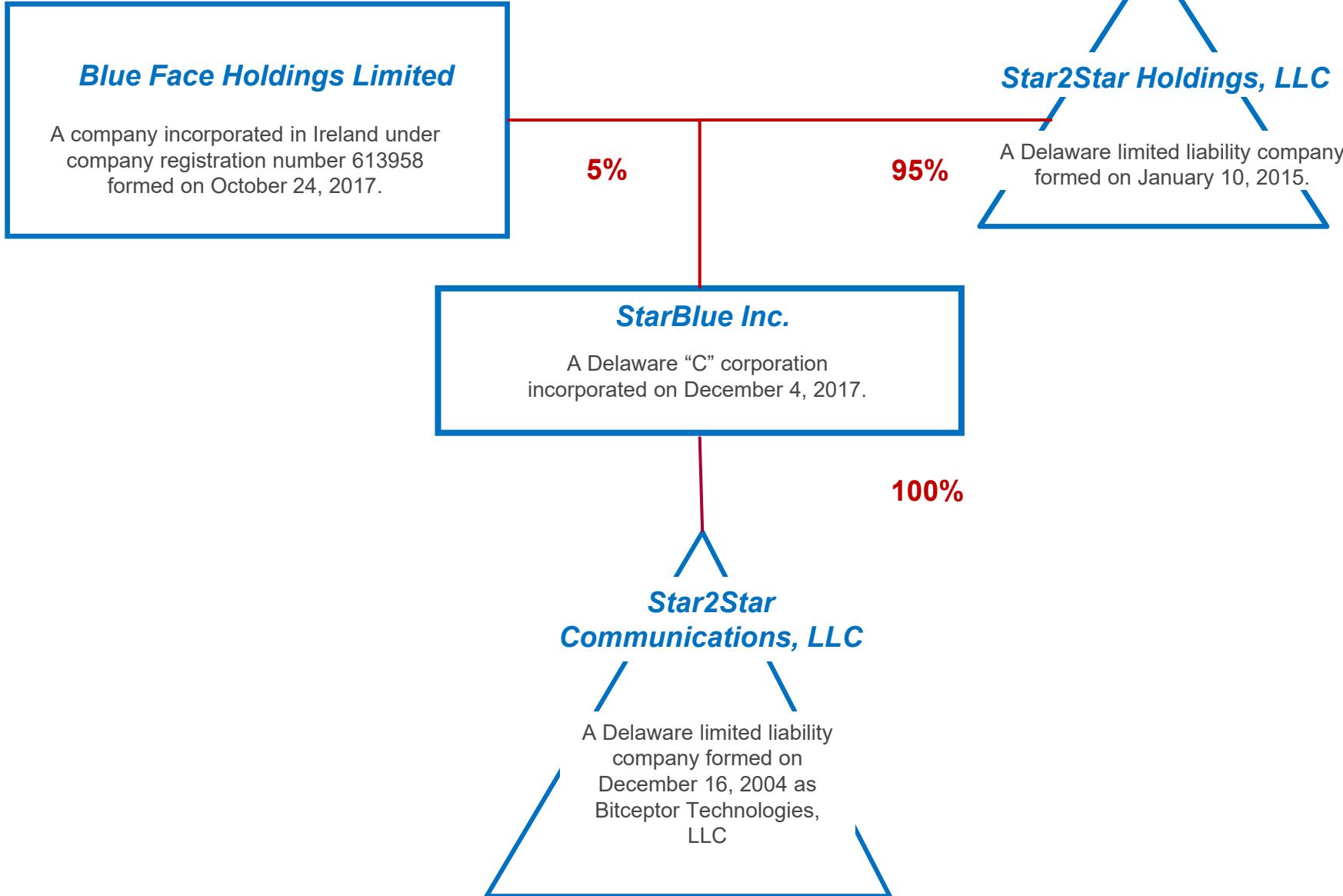
William Rogers is the Founder, Chairman, President and CEO of Teleco, Inc. as well as a member of the Board of Directors and Managing Director of National Accounts and Government Account Relationships.

Rogers has also worked with numerous other companies including American Phone Centers Inc., where he was the Founder and Chairman of the Board, Real Estate Unlimited, LLC, where he was Investor and Managing Member, Omnicall, LLC, where he was Founder and Chairman of the Board, and Corporate Telemanagement Group, LLC, where he was an Investor and the Co-Founder. He also founded Rogers Stereo, Inc., which he left in 1982.

He graduated from Temple University with a Bachelor of Science in Business Education in 1969 and received his Masters Degree in Business Education from Hofstra University in 1973.

Exhibit D

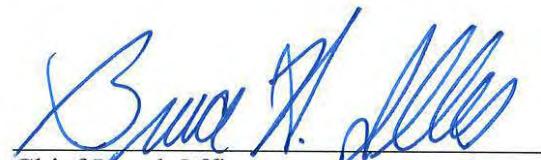
Corporate Structure



DECLARATION

Bruce H. Illes, under penalty of perjury deposes and states as follows:

1. My name is Bruce H. Illes. I am the Chief Legal Officer of Star2Star Communications, LLC.
2. I have reviewed the information set forth in the Company's Application to Obtain Numbering Resources to which this declaration is attached.
3. The statements set forth in Star2Star's Application are true and correct to the best of my knowledge, information and belief.



Chief Legal Officer
Star2Star Communications, LLC

Dated: June 6, 2020