

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

*In the Matter of* )  
 )  
ALLO Communications LLC For )  
Authorization to Obtain Numbering ) WC Docket No. 24-135  
Resources Pursuant to Section 52.15(g) of )  
The Commission's Rules )

**SUPPLEMENTAL INFORMATION TO APPLICATION OF ALLO COMMUNICATIONS LLC  
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

ALLO Communications LLC (“ALLO Communications”) pursuant to Section 52.15(g)(3)(ii) of the Commission’s Rules, respectfully submits supplemental information authorization to obtain numbering as described below. The purpose of this filing is to update the application originally filed on April 30, 2024. This updated application is based upon emails and discussions with FCC staff.

Under 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 Section 52.15.(g)(3)(ii)(A)-(N) of the Commission’s Rules. ALLO Communications hereby requests the Commission grant it that authorization. In support of this application, ALLO Communications provides the following information:

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

**A. § 52.15(g)(3)(ii)(A)**

Name: ALLO Communications LLC  
Address: 330 S 21st ST  
City: Lincoln  
State: Nebraska  
ZIP Code: 68510

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

Country: U.S.A.  
Telephone: (844) 560-2556  
Website: <https://www.allocommunications.com/>

Contact for Regulatory Requirements:

Name: Andrew Vinton  
Address: 330 S 21st ST  
City: Lincoln  
State: NE  
ZIP Code: 68510  
Country: U.S.A.  
Telephone: 402-781-4698  
E-mail Address: [andrew.vinton@allofiber.com](mailto:andrew.vinton@allofiber.com)

Compliance, 911, and Law Enforcement:

Name: Allison O'Neil  
Address: 330 S 21st ST  
City: Lincoln  
State: NE  
ZIP Code: 68510  
Country: U.S.A.  
Telephone: 308-633-7814  
E-mail Address: [allison.oneil@allofiber.com](mailto:allison.oneil@allofiber.com)

**B. § 52.15(g)(3)(ii)(B)**

ALLO Communications 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. ALLO Communications 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 the state of Nebraska.

**C. § 52.15(g)(3)(ii)(C) & (G)**

ALLO Communications 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. ALLO Communications is committed to providing full support for their customers

concerning Robocall Mitigation and call Blocking where appropriate. The Company certifies that it will not use the numbers obtained pursuant to an authorization to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 et seq. of this chapter, and 16 CFR 310.3(b).

**D. § 52.15(g)(3)(ii)(D) & (H)**

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

To demonstrate its facilities' readiness, ALLO Communications will have the following resources available at its disposal: a fully integrated back-office support system with the ability to schedule and process LNP orders from customers and an experienced provisioning department capable of handling bulk number ports with over 17 years LNP experience. ALLO Communications has an agreement in place with a carrier partner to route traffic to the ILECs. ALLO Communications has attached to this application, as ***Exhibit A***, an agreement between ALLO Communications and its carrier partner providing that the carrier partner will host ALLO Communications' numbers on its switches and provide connectivity to the PSTN for inbound calls to ALLO Communications numbers. ALLO Communications has requested confidential treatment under the Commission's rules for ***Exhibit A***. Also attached, as ***Exhibit B***, is evidence of interconnection agreements between ALLO Communications' carrier partner and the local exchange carriers in the state of Nebraska.

**STIR/SHAKEN compliant** - ALLO Communications has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 to 64.6305. The Company will provide the necessary "KYC" documentation for their customers as required by STI-GA Authorities. In addition, ALLO Communications will pass the STIR/SHAKEN certificate, without modification, to each carrier with which it exchanges call traffic.

**E. § 52.15(g)(3)(ii)(E)**

ALLO Communications hereby certifies that it complies with its 911 and 988 obligations under part 9 of the relevant chapter. The Company also complies with the provisions of the Communications Assistance with Law Enforcement Act, 47 U.S.C. 1001 et seq. (CALEA)

**F. § 52.15(g)(3)(ii)(F)**

ALLO Communications hereby certifies that it complies with the Access Stimulation rules under §51.914.

**G. § 52.15(g)(3)(ii)(I)**

ALLO Communications submits as ***Exhibit C*** proof of filing its FCC Forms 477 and 499.

**H. § 52.15(g)(3)(ii)(J)**

ALLO Communications 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.

**I. § 52.15(g)(3)(ii)(K)**

ALLO Communications 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 numbering services. ALLO Communications' 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.

**Key Personnel:**

Brad Moline – Chief Executive Officer

Don Schoening – Chief Field Services Officer  
Nate Buhrman – Chief Financial Officer  
Allison O’Neil – Chief Experience Officer  
Todd Heyne - Chief Construction Officer

**J. § 63.18(h) & (i)**

ALLO Communications is not affiliated with any foreign carrier or has any interlocking directorates with a foreign carrier.

**K. § 52.15(g)(3)(ii)(M)**

ALLO Communications 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), ALLO Communications 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. ALLO Communications 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) of the Commission's Rules, ALLO Communications respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

/s/ Nelson Fernandez  
Nelson Fernandez – Consultant & Technical Implementation Manager  
Inteserra, Inc.  
(470) 672-3933  
[nfernandez@inteserra.com](mailto:nfernandez@inteserra.com)

October 3, 2024

## **Exhibit A**

**(Please See Original Filing)**

## **Exhibit B**

**(Please See Original Filing)**

## **Exhibit C**

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# FCC Form 499 Filer Database DETAILED INFORMATION

 [Form 499 Filer 824034 RSS Feed](#)

### Filer Identification Information:

No Longer Active as of .

Replaced by filer: [\\_](#)

### Historical Data:

499 Filer ID Number:	<b>824034</b>
Registration Current as of:	<b>4/1/2024</b>
Legal Name of Reporting Entity:	<b>Allo Communications, LLC</b>
Doing Business As:	<b>Allo Communications, LLC</b>
Principal Communications Type:	<b>CAP/LEC</b>
Universal Service Fund Contributor:	<b>Yes</b>
(Contact USAC at 888-641-8722 if this is not correct.)	
Holding Company:	
Registration Number (CORESID):	<b>0010480978</b>
Management Company:	
Headquarters Address:	<b>330 S 21st Street</b>
City:	<b>Lincoln</b>
State:	<b>NE</b>
ZIP Code:	<b>68510</b>
Customer Inquiries Address:	<b>330 S 21st Street</b>
City:	<b>Lincoln</b>
State:	<b>NE</b>
ZIP Code:	<b>68510</b>
Customer Inquiries Telephone:	<b>866-481-2556 Ext:</b>
Other Trade Names:	<b>Allo Communications</b>

### Agent for Service of Process:

Local/Alternate Agent for Service  
of Process:

Telephone:  
Extension:  
Fax:  
E-mail:

### Business Address of Agent for

Mail or Hand Service of Documents:

City:  
State:  
ZIP Code:

D.C. Agent for Service of Process: **CT Corporation System**  
**CT Corporation System**

Telephone: **202-393-1747**  
Extension: **202-393-1760**  
Fax: **info@ctadvantage.com**

Business Address of D.C. Agent for  
Mail or Hand Service of Documents: **1025 Vermont Avenue, NW**  
**Washington**  
**DC**  
**20005**

### FCC Registration Information:

Chief Executive Officer: **Bradley Moline**  
Business Address: **610 Broadway**  
**PO Box 1123**  
City: **Imperial**  
State: **NE**  
ZIP Code: **69033**

Chairman or Other Senior Officer: **Allison O'Neil**  
Business Address: **610 Broadway**

PO Box 1123  
City: Imperial  
State: NE  
ZIP Code: 69033

President or Other Senior Officer: **Nate Buhman**  
Business Address:  
City: Lincoln  
State: NE  
ZIP Code: 68510

## Jurisdictions in Which the Filing Entity Provides Telecommunications Services:

Colorado  
Nebraska

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This database reflects filings received by USAC as of Jul. 22, 2024

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Federal Communications Commission  
45 L Street NE  
Washington, DC 20554  
[More FCC Contact Information...](#)

Phone: 1-888-CALL-FCC (1-888-225-5322)  
TTY: 1-888-TELL-FCC (1-888-835-5322)  
Fax: 1-866-418-0232

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## Submission Overview

ERN: 0010480978 | Service Provider | Allo Communications LLC

SUBMISSION CERTIFIED

Data as of June 30, 2024

## Biannual Filing Window

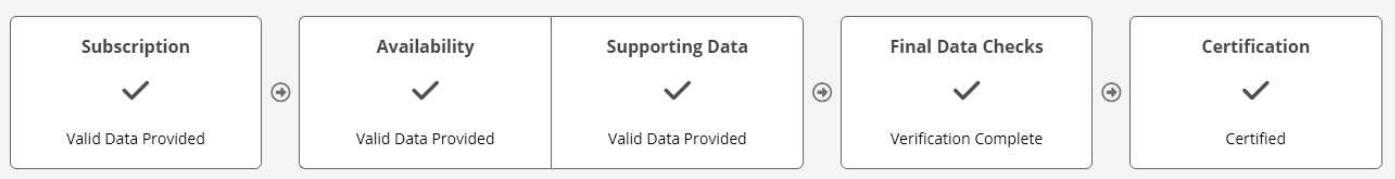
DATA AS-OF DATE	WINDOW OPEN	WINDOW STATUS
Jun 30, 2024	Jul 1, 2024	CLOSED
TODAY'S DATE	WINDOW CLOSE	FILING STATUS
Oct 2, 2024	Sep 3, 2024	Original - Certified

## Fixed Data Requests

Fixed Challenges	0
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## Submission Steps

Decertify Submission



## Fixed Submission Data

Service	Subscription Data	Availability Data	
	Subscribers	Locations	Supporting Data
Fixed Broadband	123,127	310,002	✓ 1 of 1
Fiber to the Premises	123,127	310,002	✓ 1 of 1
Fixed Voice	50,024		
Non-ILEC	50,024		