

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

Business Telecommunications Services, Inc.	)	
	)	<b>WC Docket No. 20-116</b>
Application for Authority to Obtain Direct	)	
Access to Numbering Resources Pursuant to	)	
Section 52.15(g) of the Commission's Rules	)	

**SUPPLEMENT TO APPLICATION**

Business Telecommunications Services, Inc. (“BTS”), by counsel and pursuant to section 52.15(g)(3)(i) of the rules of the Federal Communications Commission (the “FCC” or “Commission”), submits this Supplement (“Supplement”) to its previously filed application requesting authority to directly obtain numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator (“Application”).<sup>1</sup> BTS’s pending Application requests authorization to provide service in the area(s) for which the numbering resources are requested, and a grant of the Application would constitute such authority.<sup>2</sup> BTS respectfully requests that the Commission consider the clarifications contained in this Supplement in reviewing and granting the pending Application.

BTS is a provider of interconnected Voice over Internet-Protocol (“VoIP”) services, currently provided on a wholesale basis. BTS submitted its Application to the Commission on June 11, 2020 for authority to provide service in the area(s) for which numbering resources are

---

<sup>1</sup> See *Business Telecommunications Services, Inc., Application for Authority to Obtain Direct Access to Numbering Resources Pursuant to 52.15(g) of the Commission's Rules*, WC Docket No. 20-166 (filed Jun. 11, 2020) (“BTS Application”).

<sup>2</sup> 47 C.F.R. §52.15(g)(3).

requested.<sup>3</sup> Pursuant to Section 52.15(g)(3)(i), with this Supplement, BTS offers the following clarifications to its Application:

- A. BTS clarifies the ownership of its structure. BTS holds a Section 214 application for individual switched access service, granted on December 20, 1996.<sup>4</sup> BTS is a Florida corporation owned in equal shares by entities controlled by Rafael Olloqui and Ricardo Olloqui. This Supplement clarifies that both Rafael and Ricardo Olloqui are United States citizens. Rafael Olloqui became a U.S. citizen on April 12, 2019 and Ricardo Olloqui became a U.S. citizen on May 18, 2020. At this time, the Company is now fully held by U.S. citizens, alleviating any international ownership concerns in granting this Application. Key management personnel are identified in Attachment 3 to the Application.<sup>5</sup>
- B. BTS has an operating agreement (the “Agreement”) with a carrier partner in the United States, Peerless Network, Inc., that provides BTS with public switched telephone network (“PSTN”) access through that partner entity’s approved interconnection agreements (“ICAs”) with the relevant local exchange carriers, as submitted in the Application.<sup>6</sup> BTS provided a copy of the Agreement in its original Application (as Attachment 2 to the Application). BTS’s carrier partner maintains ICAs with ILECs in Florida and throughout the country. At the Bureau’s request, BTS provides at Attachment 1 to this Supplement a copy of the state of Florida’s approval of the Peerless’s ICA with ILECs,

---

<sup>3</sup> 47 C.F.R. § 52.15(g)(2).

<sup>4</sup> See File No. ITC-214-19961028-00541.

<sup>5</sup> See BTS Application, Attachment 3.

<sup>6</sup> See *id.*, Attachment 2.

which also was submitted in several recently approved applications for numbering authority, including Assurance Telecom, LLC.<sup>7</sup>

Upon grant of this authority, BTS intends to amend its interconnection agreement with its partner to provide the critical resources needed for efficient porting of numbers.

C. BTS clarifies that it has the ability to both originate and terminate service through Peerless. In addition to the services previously described, BTS has requested VoIP Control Service from Peerless, the same service relied upon Stratus Networks in its approved application.<sup>8</sup> BTS additionally has an existing master service agreement (“MSA”) with Peerless, and can add other Service Orders as needed. Thus, if necessary, BTS can obtain additional services within 60 days of approval of its request.<sup>9</sup> As mentioned in its Application, BTS initially seeks access to numbers only in the state of Florida.

---

<sup>7</sup> See *Notice of Interconnected VoIP Numbering Application Granted* (Assurance Telecom, LLC), DA 20-152, WC Docket No. 19-335 (rel. Feb. 13, 2020). Assurance submitted a Peerless ICA with the AT&T ILECs, including Florida in Docket 19-335 on Dec. 16, 2019. Assurance Telecom, LLC, Supplement, WC Docket No. 19-335, filed Dec. 16, 2019 (available at <https://www.fcc.gov/ecfs/filing/1216272011264>).

<sup>8</sup> See *Stratus Networks, Inc., Application of Stratus Networks, Inc. for Authorization to Obtain Numbering Services*, WC Docket No. 19-306 (Sept. 16, 2019); See *Notice of Interconnected VoIP Numbering Authorization Granted*, Public Notice, WC Docket No. 19-306 (rel. Jan. 17, 2020), available at [https://ecfsapi.fcc.gov/file/011712153856/DA-20-86A1\\_Rcd.pdf](https://ecfsapi.fcc.gov/file/011712153856/DA-20-86A1_Rcd.pdf).

<sup>9</sup> 47 C.F.R. §52.15(g)(3)(i)(D).

## **CONCLUSION**

BTS requests that the Commission consider this Supplement to its Application, pursuant to Section 52.15(g)(3)(i) of the rules, for authority, in its capacity as a provider of interconnected VoIP services, to directly obtain numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator.

Respectfully Submitted,

**BUSINESS TELECOMMUNICATIONS  
SERVICES, INC.**



---

Steven A. Augustino  
KELLEY DRYE & WARREN, LLP  
3050 K Street NW  
Suite 400  
Washington, DC 20007  
(202) 342-8540

September 30, 2020

*Counsel to Business Telecommunications  
Services, Inc.*