

**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*,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)(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

¹ *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

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

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. In its original application, ALLO Communications attached, 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. With this supplement ALLO Communications submits supplemental information to *Exhibit A*. 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. Please see *Exhibit C*. ALLO Communications has requested confidential treatment under the Commission's rules for *Exhibit A*. 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 D* 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, including the Commission's rules in this chapter applicable to unlawful robocalls or unlawful spoofing.

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 submits as *Exhibit E* a detailed ownership diagram. ALLO Communications LLC is a wholly owned subsidiary of ALLO Intermediate Holdings, LLC and ALLO Holdings, LLC. ALLO Holdings, LLC is a subsidiary of Nelnet, Inc. and SDC Allo Holdings, LLC. Michael S. Dunlap, is the controlling shareholder of Nelnet, Inc. Mr. Dunlap indirectly owns approximately 19.27% of ALLO Communications LLC via his ownership of Nelnet, Inc. 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

January 23, 2025

Exhibit A

AGREEMENT BETWEEN

ALLO COMMUNICATIONS AND CARRIER PARTNER

(Confidential exhibit submitted separately)

Exhibit B

(Please See Original Filing)

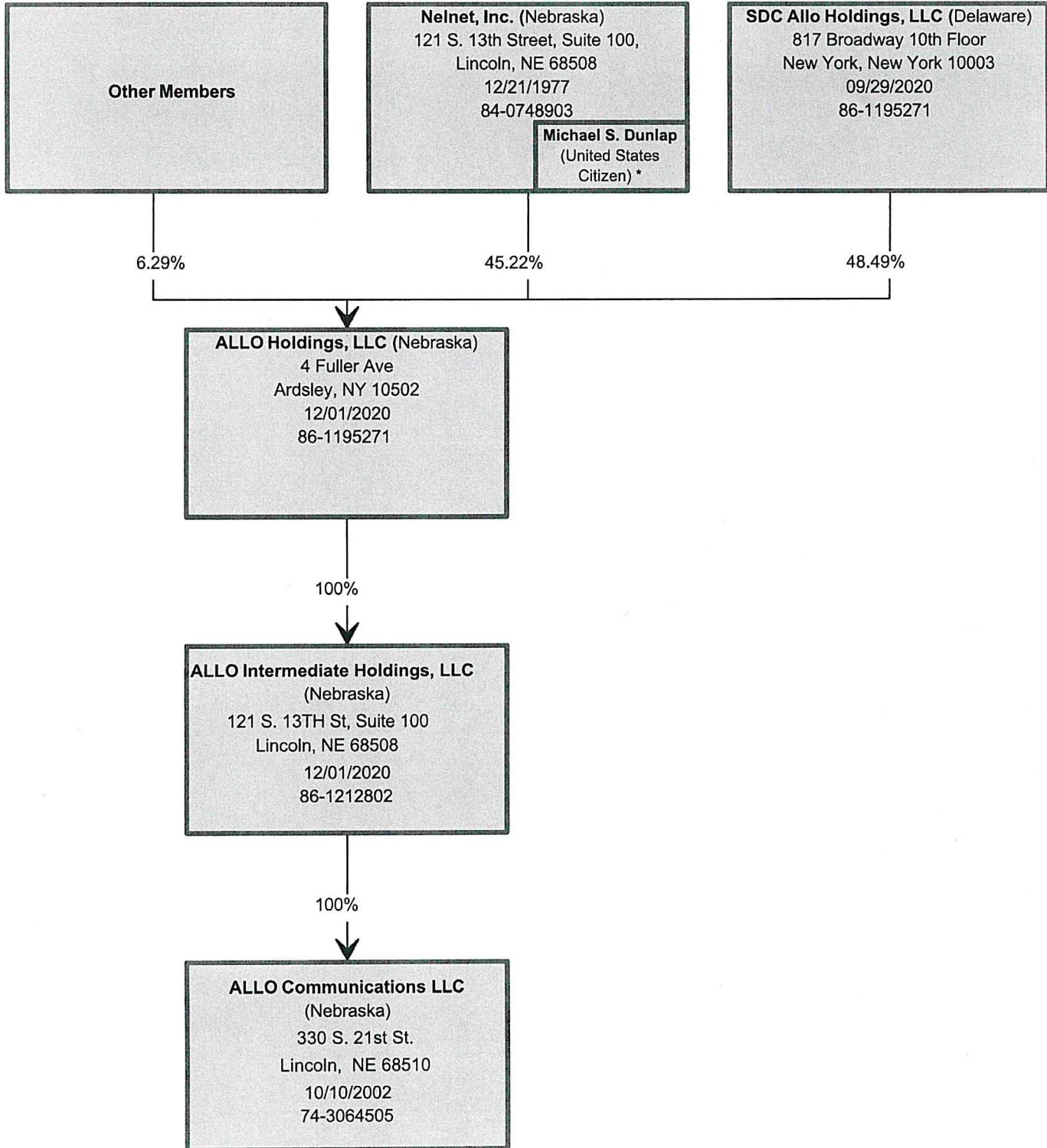
Exhibit C

(Confidential exhibit submitted separately)

Exhibit D

(Please see Previous Filing)

Exhibit E



NOTES:

* Mr. Mike S. Dunlap has an indirect ownership interest in ALLO Communications.

Verification

I swear under penalty of perjury that I am Brad Moline, an officer of the above-named applicant, ALLO Communications LLC, and that I have examined the foregoing submissions, and previously filed supplements and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

/s/Brad Moline
Brad Moline, CEO