

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

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

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 “Commission”), respectfully requests authority, in its capacity as a provider of interconnected Voice-over-Internet-Protocol (“VoIP”) services, to directly obtain numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator. One of the requirements to obtain such numbering resources is demonstration that the requesting company is authorized to provide service in the area for which the numbering resources are requested.¹ Grant of this application will constitute such authority.²

Pursuant to Section 52.15(g)(3)(i), BTS submits the following:

A. **The Applicant**

Business Telecommunications Services, Inc.
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¹ 47 C.F.R. §52.15(g)(2).

² 47 C.F.R. §52.15(g)(3).

- B. BTS acknowledges that authorization to obtain numbering resources granted under this paragraph 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 carriers.³
- C. BTS 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.⁴
- D. BTS is capable of providing service within sixty days⁵ in the states where it proposes to request numbering resources. BTS initially seeks access to numbers only in the state of Florida.

BTS has provided wholesale telecommunications and interconnected VoIP services for over 25 years. The Company, based in Miami, FL and Zaragoza, Spain, has interconnection agreements with over 180 carriers worldwide and carries traffic to and from 200 countries. Background information on BTS and its history is provided in Attachment 1.

The Company 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

³ 47 C.F.R. §52.15(g)(3)(i)(B).

⁴ 47 C.F.R. §52.15(g)(3)(i)(C).

⁵ 47 C.F.R. §52.15(g)(3)(i)(D).

carriers. As demonstration of this readiness, the Company provides a copy of agreements with its carrier partner, Peerless Network, Inc. as Attachment 2. These agreements are provided under seal, with an accompanying request for confidentiality.

BTS's carrier partner maintains interconnection agreements ("ICAs") with ILECs in Florida and throughout the country. Evidence of Peerless's ICAs with ILECs in Florida was submitted in several recently approved applications for numbering authority, including Assurance Telecom, LLC.⁶

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

⁶ 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>).

- E. BTS 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 NANP and LNP 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;⁷
- F. BTS certifies that it possesses the financial, managerial, and technical expertise to provide reliable service.⁸ Key management personnel are identified in Attachment 3. None of the identified personnel are being or have been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.
- G. BTS certifies that it is not subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.⁹

⁷ 47 C.F.R. §52.15(g)(3)(i)(E).

⁸ 47 C.F.R. §52.15(g)(3)(i)(F).

⁹ 47 C.F.R. §52.15(g) (3)(i)(G); 47 C.F.R. § 1.2001, 1.2002.

Pursuant to 52.15(g)(3)(iv), BTS commits to compliance with the conditions applicable to all interconnected VoIP provider numbering authorizations, specifically to:

- (A) *Maintain the accuracy of all contact information and certifications in its application. If any contact information or certification is no longer accurate, the provider must file a correction with the Commission and each applicable state within thirty (30) days of the change of contact information or certification. The Commission may use the updated information or certification to determine whether a change in authorization status is warranted;*
- (B) *Comply with the applicable Commission numbering rules; numbering authority delegated to the states; and industry guidelines and practices regarding numbering as applicable to telecommunications carriers;*
- (C) *File requests for numbers with the relevant state commission(s) at least thirty (30) days before requesting numbers from the Numbering Administrators;*
- (D) *Provide accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.*¹⁰

CONCLUSION

For the foregoing reasons, BTS requests, pursuant to Section 52.15(g)(3)(i) of the rules, authority, in its capacity as a provider of interconnected Voice-over-Internet-Protocol (“VoIP”) services, to directly obtain numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator.

¹⁰ 47 C.F.R. §52.15(g)(3)(iv)(A-D).

Respectfully Submitted,

**BUSINESS TELECOMMUNICATIONS
SERVICES, INC.**



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Attachment 1
Background on BTS

BTS began providing telecommunications services in 1993, initially offering a variety of wholesale and retail long distance services. In 1996, BTS established direct routes for the termination of international voice services throughout Latin America and the Caribbean. In 2001, BTS expanded its reach with strategic agreements with foreign operators in Latin America and Africa. Today, BTS has offices in Miami, Florida, Zaragoza, Spain, Singapore and Dubai. BTS has interconnection agreements with over 180 carriers worldwide and carries traffic to and from 200 countries.

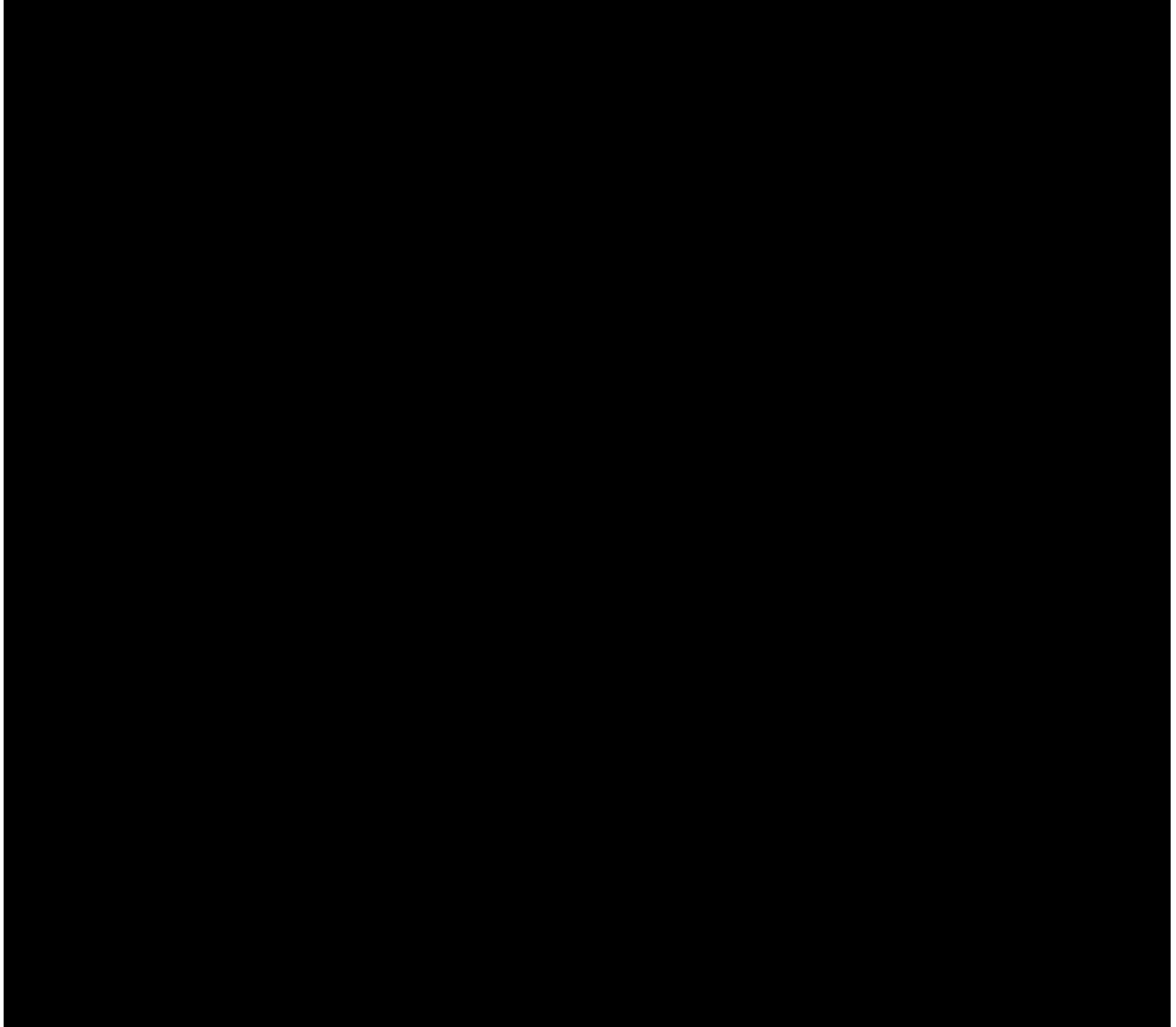
BTS is a member of numerous industry organizations, including the i3 Forum, GBET Association, GW Tracker and ITW's Global Leadership Forum's Communications Blockchain Network.

Attachment 2

BTS Agreements with Peerless Network, Inc.

(filed confidentially under seal)

Confidential Treatment Requested



Attachment 3

Key Management and Technical Personnel

Rafael Olloqui. President & Co-Founder of BTS Group. Mr. Olloqui is responsible for global and executive strategies for Grupo BTS. Mr. Olloqui has nearly 30 years' experience in telecommunications and has overseen BTS' growth from its founding in 1993. Leading publications in the US, have named Rafael Olloqui among the most important Hispanic entrepreneurs in South Florida on numerous occasions. In 2001, The US-Spain Chamber of Commerce awarded BTS the honor of "Company of the Year," which has recognized this Spanish business each year, for its excellent results and potential in the North American market. In 2002, the Spanish Chamber of Commerce in the US gave Rafael Olloqui the "Top Young Executive Award." In 2003, the Latin Chamber of Commerce in the United States (CAMACOL), awarded him the "Special Recognition Award" for his support to the business community, and his contribution to the economic development of Miami-Dade. In 2005 and 2006, South Florida CEO magazine included BTS in its list of "Florida's Top 500 Private Companies."

Rafael Olloqui was a member of The US-Spain Chamber of Commerce for 8 years, and was its first vice president. He is currently the treasurer of the "Centro Cultural Español de Cooperación Iberoamericana", and is an administrator, and member, of the Board of Directors at St. Thomas University and CAMACOL.

Ricardo Olloqui. President & Co-Founder of BTS Group. Mr. Olloqui is responsible for customer relations as well as the development of new business, partnerships and BTS operations. He has nearly 30 years' experience in telecommunications, and has been involved in the growth of BTS since 1993. Ricardo is a member of the 100 Circle of the Chamber of Commerce of Greater Miami, a member of the board of the "Fundación Vizcaya," a member of the US-Spain Council, a member of the Spanic Heritage Advisory Board, and has been a member of the board of The US-Spain Chamber of Commerce, for the past 8 years. In 2002, Ricardo Olloqui won the "Top Young Executive Award," given by the Spanish Chamber of Commerce in the United States.

Andrés Proaño. Chief Financial Officer and Executive Vice President. Andres Proaño is the chief financial officer and executive vice president of BTS Group. Mr. Proaño has extensive operational and financial experience in BTS for over sixteen years of service. Mr. Proaño is responsible for BTS's overall financial and strategic management, including the company's financial reporting, long-range business planning, and investor relations. Additionally, he oversees Business Operations, Corporate Development, Strategy, Treasury, and other corporate functions. Mr. Proaño earned a Master's Degree in Business Administration from Georgia Southern University and Bachelor's degree in Business Administration in Finance and Economics from Georgia Southern University.

Luis Benavente. CTO of BTS Group. Mr. Benavente is responsible for network operations as well as development of new services and platforms used by BTS and its clients. He has over 30 years' experience in technology developing solutions for the telecommunications industry, and has been involved in the growth of BTS since 1999. He has worked in many international projects in all continents. Luis holds a degree in physics and an MBA. He also has several certifications ranging from artificial intelligence to fintech.

Juan Florez. Commercial Vice President. Mr. Florez has over 25 years of telecommunications experience in International and Domestic voice services delivered to a broad range of customers worldwide. Juan possesses an in-depth understanding of the technology, services and marketplace with the ability to sustain financial performance through both individual contributions and team management. Juan holds a bachelor's degree in Electronics Engineering from the Universidad Santo Tomás de Aquino in Colombia and a Master's degree in Telecom Regulation from Universidad Externado de Colombia.

Jesus Mendia. Senior Director Traffic Management & Marketing. With more than 15 years' experience in telecom industry, Mr. Mendía is responsible for routing and bilateral deals among other tasks. He is also in charge of creating products and to manage and control providers' cost basis for BTS. He has been involved in multiple complex operations projects for BTS, including its joint venture with a major Japanese investment company and studies to increase retail operations, innovation, modernization and adaptation of company resources. Mr. Mendía earned his Bachelor of Arts degree in Business Administration in the Business Cardiff School (University of Wales).

Javier Gallert. Chief Voice and Network Engineer. Mr. Gallert has significant experience in deploying large VoIP systems all over the world. He was the chief designer of the BTS VoIP platform, which has been running billions of minutes for several years. He is also in charge of the STIR/SHAKEN implementation as an addition to the platform. Javier obtained a degree in Telecom Engineering from the University of Zaragoza.

Fernando Abras. Chief Legal Counsel. Mr. Abras is responsible for BTS's legal team, including the legal supervision of all interconnections, supervision of the compliance policies, preparation and negotiation of JV and M&A contracts, as well as legal advice for its corporate development and strategy. Mr. Abras earned three 5-year Degrees in Law, Business Administration and Political Sciences from Comillas University (ICADE) in 2009, and he studied at the Diplomatic School of Madrid and worked at the Legal Department of the International Trade Center (WTO-UNCTAD) before joining BTS.

Maria del Carmen Perez. Project Manager. Ms. Perez holds a bachelor's degree in computer systems engineering from the University of Zaragoza and a Master's degree in IT management from the European University from Madrid. She has served as PMP at the Project Management Institute since 2010, ITIL IE Service Design since 2015 and Scrum Manager Certified since 2016, she is in continuous learning on Agile methodologies and best practices on projects and team management. She has been serving in a variety of management roles in BTS for over 15 years.