

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
AM Communication Labs, Inc.) WC Docket No. 24-628
)
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

**APPLICATION OF AM COMMUNICATION LABS INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

AM Communication Labs Inc. (“AM Comm”), pursuant to Section 52.15(g)(3)(ii) of the Commission’s Rules, respectfully requests the Commission’s authorization to obtain numbering resources as described below.

As set forth in the Commission’s *Second 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. This authorization may be obtained upon an application to the Commission containing the information detailed in Sections 52.15(g)(3)(ii)(A)-(N) of the Commission’s Rules. AM Comm, an interconnected VoIP provider, hereby requests the Commission grant it that authorization. In support of this application, AM Comm provides the following information.

¹ *Numbering Policies for Modern Communications et al.*, Secord Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd. 8951 (10) (2023).

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

(A) § 52.15(g)(3)(ii)(A)

Name: AM Communication Labs Inc.
Address: 11335 NE 122nd Way, Suite 105
Kirkland, WA 98034
Telephone: 1-800-687-7530
Website: <https://amcomlabs.io/>

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

Name: Jason Jantz, CEO
Address: 11335 NE 122nd Way, Suite 105
Kirkland, WA 98034
Telephone: 1-800-687-7530
Email: jason@amcomlabs.io

(B) § 52.15(g)(3)(ii)(B)

AM Comm hereby acknowledges that the authorization granted under this paragraph is subject to compliance with applicable Commission number rules, numbering authority delegated to the states, and state laws, regulations, and registration requirements. AM Comm acknowledges that authorization is subject to compliance with industry guidelines and numbering practices applicable to telecommunications carriers. The numbering resources subject to this Application will be used at first in the States of Texas, Georgia, and Florida.

(C) § 52.15(g)(3)(ii)(C)

AM Comm certifies that the applicant will not use the numbers obtained pursuant to an authorization under this paragraph to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under 47 C.F.R. §§ 64.1200, 64.1604, and 64.6300, and 16 CFR § 310.3(b).

(D) § 52.15(g)(3)(ii)(D)

Am Comm certifies it has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements, and maintains its certification in the Robocall Mitigation Database, as required by 47 C.F.R. §§ 64.6301 to 64.6305. Its current RMD submission is available here:
https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=2b4832a31bf030509294113d9c4bcbf8&view=sp.

(E) § 52.15(g)(3)(ii)(E)

AM Comm certifies that it complies with its 911 obligations under part 9 of this chapter, and that it complies with the provisions of the Federal Communications Commission FCC 23-75. Evidence in support of this certification can be found in **Confidential Exhibit A**.

(F) § 52.15(g)(3)(ii)(F)

AM Comm certifies that it complies with the Access Stimulation rules under 47 C.F.R. § 51.914 (namely, it has never engaged in Access Stimulation and does not tariff or assess any switched access charges).

(G) § 52.15(g)(3)(ii)(G)

AM Comm understands that it must file requests for numbers with the relevant state commissions at least 30 days prior to requesting numbers from the Numbering Administrator.

(H) § 52.15(g)(3)(ii)(H)

AM Comm has the capability to provide services within 60 days of the numbering resource activation date.

AM Comm has obtained OCN 782J for, among other purposes, the numbering resources sought in this Application. AM Comm, directly and through its CLEC carrier-partner vendors,

will have access to an integrated back office support system that can schedule and process LNP orders from customers and an experienced provisioning department capable of handling bulk number ports. AM Comm has executed an agreement with a CLEC partner to route traffic to and from local exchange carriers. AM Comm has attached as **Confidential Exhibit A**, an agreement between AM Comm and its CLEC partner that provides the carrier will host AM Comm's numbers on its switches and provide connectivity to and from the PSTN for calls to and from AM Comm numbers. AM Comm requests confidential treatment under Commission rules for **Confidential Exhibit A**.

AM Comm's agreement with its CLEC partner will allow it to send and receive calls via the PSTN and other networks. AM Comm has established IP interconnection trunks with its CLEC partner. This will allow AM Comm's IPES customers to originate and terminate traffic through that partner. This arrangement will also allow IPES customers to complete emergency and other 911 calls.

The interconnection agreements (ICAs) between AM Comm's CLEC partner and a local exchange carrier in Texas, Georgia, and Florida is lengthy. AM Comm includes as **Exhibit B** the General Terms and Conditions and the Interconnection sections of that agreement. The entire ICAs with the AT&T-affiliated LECs are available at https://clec.att.com/clec_cms/clec/Docs/Doc_1984031.pdf and https://clec.att.com/clec_cms/clec/Docs/Doc_1984160.pdf. The ICA excerpt for the Verizon incumbent region in Florida is included in Exhibit B.

(I) § 52.15(g)(3)(ii)(I)

AM Comm certifies it has filed all applicable FCC Forms 477 and 499. The most recent confirmation receipts can be provided upon request.

(J) § 52.15(g)(3)(ii)(J)

AM Comm hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 C.F.R. 54, subpart H; its Telecommunications Relay Service contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii); its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32; and its obligations to pay regulatory fees under 47 C.F.R. § 1.1154.

(K) § 52.15(g)(3)(ii)(K)

AM Comm hereby 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 communications and UCaaS industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering and related VoIP services.

AM Comm has the superior technical qualifications necessary to provide and maintain successful operations within its service area. AM Comm has the capabilities to efficiently port and place numbers into service and successfully route calls. Additionally, AM Comm's management team's lengthy experience with number porting via current third-party carrier partners enables it, along with its carrier partners, to create routing arrangements that seamlessly deliver calls to and from numbers directly assigned to AM Comm.

Furthermore, AM Comm's personnel have extensive business and network management experience in telecommunications-related businesses and in serving its targeted customer segment, including corporate enterprises and business customers of IP, communications, and information services. These individuals lead a team that is highly qualified to manage the operations of AM Comm throughout its service area. The names, titles, biographies, and contact

information of AM Comm's key management and technical personnel are reflected in **Exhibit C** hereto. None of the identified personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

(L) § 52.15(g)(3)(ii)(L)

Information Required Under 47 C.F.R. § 63.18(h)

The individuals or entities that directly or indirectly own at least 10 percent of the equity of AM Comm are listed in **Exhibit D**.

Certification Required Under 47 C.F.R. § 63.18(i)

AM Comm certifies that it is not itself, and is not affiliated with, a foreign carrier.

(M) § 52.15(g)(3)(ii)(M)

AM Comm 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.

(N) § 52.15(g)(3)(ii)(N)

Mr. Jantz's declaration under penalty of perjury attesting to the truth and accuracy of the statements herein is included below.

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

As required by Section 52.15(g)(3)(x), AM Comm 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. AM Comm will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

III. CONCLUSION

AM Comm respectfully requests that the Commission grant its application for authorization to obtain numbering resources.

Originally Filed: October 30, 2024

Last Amended: February 10, 2025

Respectfully submitted,



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ROTH JACKSON
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Richmond, Virginia 23230
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Counsel to AM Communication Labs Inc.

VERIFICATION

I, Jason Jantz, CEO of AM Communication Labs Inc. ("AM Comm"), and a resident of Vancouver, British Columbia, Canada, declare under penalty of perjury, that the information in AM Comm's Direct Access to Numbering Resources Application, and the information in and enclosed with our counsel's supplemental letter, is true and correct to the best of my knowledge and the company's records.

Date: 2/10/2025

Signed by:
By: 
Jason Jantz, CEO
AM Communication Labs Inc.
4C16605280C84BF

CONFIDENTIAL EXHIBIT A

CONFIDENTIAL – REDACTED IN ITS ENTIRETY

EXHIBIT B

**GENERAL TERMS AND CONDITIONS AND INTERCONNECTION SECTIONS
FROM AGREEMENT WITH CLEC PARTNER**

EXHIBIT C

KEY MANAGEMENT AND TECHNICAL PERSONNEL

The following are the names, titles, and brief biographies of AM Communication's key management and technical personnel are as follows:

Jason Jantz - CEO

Jason Jantz is a founder of AM Comm and began his voice services and UCaaS career ten years ago when he formed ReadyMode.com (f/k/a XenCALL), a cloud communications platform for contact centers and other enterprise clients. Jason is a member of the Forbes Technology Council and has 20 years' experience in UCaaS/CCaaS in a leadership, revenue, and go-to-market capacity. As part of those duties, Mr. Jantz negotiates and oversees the company's commercial arrangements with the various carriers, voice service providers, and other contractors that facilitate and underlie AM Comm's provision of voice services, including the management of the company's numbering resources, which it currently procures via carrier partners but is poised to manage directly via the Numbering Administrators and the various parties in the numbering ecosystem.

Imed Yahmadi - CTO

Imed Yahmadi is an experienced software developer for UCaaS and voice services verticals. Prior to joining AM Comm and ReadyMode.com, he was the Director of Engineering at Five9, a Cloud Contact Center provider. Among his other academic accomplishments, Imed obtained a certificate in Neural Networks and Deep Learning in 2017, and a Certificate in Google Cloud Platform Fundamentals in 2019. Mr. Yahmadi will be primarily responsible for overseeing and directing the company's day-to-day use and operation of the company's numbering resources.

Carson Wilson - Senior Director of Voice Services & Operations

Carson Wilson has over ten years of experience managing production and non-production environments. Carson is an experienced process implementation expert, having implemented departmental and corporate policies and procedures in a wide variety of industries from FinTech to Voice Enabled SaaS products. Carson manages Telco carrier relationships, monitors and manages voice traffic quality, and performs extensive analytics and diagnostics for origination and termination traffic on AM Comm's platform. Carson's skills include virtual telco switch operations, advanced data analytics and diagnostics, database design including schema and normalization, and ingestion of vast quantities of data. Carson also plans and manages major corporate technology initiatives. Additionally, Carson has extensive experience with compliance processes and tools widely used in the Telecom industry. Carson will be the primary contact and implementer of the numbering issuer project and corresponding resources.

EXHIBIT D

The following individuals or entities directly or indirectly own at least 10 percent of the equity of AM Comm:

Jason Jantz, CEO (via the Jantz Family Trust)
11335 NE 122nd Way, Suite 105
Kirkland, WA 98034
Citizenship: Canada
Equity Interest: 72.8%

Imed Yahmadi, CTO
11335 NE 122nd Way, Suite 105
Kirkland, WA 98034
Citizenship: Canada
Equity Interest: 27.2%

This diagram represents applicant's vertical ownership structure:

