

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

**Public Version –
Confidential
Information Excluded**

In the Matter of Number Access, LLC) WC Docket No. 18- _____
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

APPLICATION OF NUMBER ACCESS, LLC
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES

Number Access, LLC (“Number Access” or “Company”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requests authorization to obtain numbering as described below.

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)(i)(A)-(G) of the Commission’s Rules. Number Access hereby requests the Commission grant it that authorization. In support of this application, Number Access provides the following information:

I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)
A. § 52.15(g)(3)(i)(A)

Name: Number Access, LLC
Address: 2701 Devils Glen Road, Suite 200
City: Bettendorf
State: IA
ZIP Code: 52722
Telephone: +1 (563) 362-0000

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

Name: Christopher Finne, Managing Member
Address: 2701 Devils Glen Road, Suite 200
City: Bettendorf
State: IA
ZIP Code: 52722
Telephone: +1 (563) 362-2590

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

Facsimile: +1 (563) 362-0000
E-mail: chris.finne@numberaccess.com

B. § 52.15(g)(3)(i)(B)

Number Access 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. The Company 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 Colorado, District of Columbia, Florida, Georgia, Iowa, Maryland, Massachusetts, Nevada, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Texas, and Virginia. Number Access anticipates that it will provide interconnected VoIP service nationwide, and accordingly, will request numbers from the other states in turn after its initial requests in the listed states. Accordingly, to the extent required, Number Access requests the Commission grant it authority to obtain numbering resources in all states.

C. § 52.15(g)(3)(i)(C)

Number Access 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.

D. § 52.15(g)(3)(i)(D)

Number Access hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. Number Access is a recently-established interconnected VoIP provider. However, the Company was founded by experienced telecommunications professionals, and has an agreement in place with a competitive local exchange carrier ("CLEC") to route traffic to the incumbent carriers. As part of its agreement, this CLEC has agreed to host Number Access's numbers on its switches, and provide PSTN connectivity for inbound calls to these numbers. A copy of this agreement is attached as ***Exhibit A*** to this application. Number Access respectfully requests this

agreement be accorded confidential treatment, pursuant to §0.459 of the Commission's rules.² As

Exhibit B, Number Access provides a current interconnection agreement between Number Access's CLEC vendor and an incumbent local exchange carrier ("ILEC").

In addition, the Company has developed an integrated back office support system with the ability to schedule and process LNP orders from customers, and has staff experienced in handling Local Number Portability between itself and other carriers and interconnected VoIP providers.

E. § 52.15(g)(3)(i)(E)

Number Access hereby certifies that it will comply 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 9.³

F. § 52.15(g)(3)(i)(F)

The Company 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 service.

Number Access's key management and technical personnel are listed below, and more information concerning the managerial and team is included in **Exhibit C**.⁴ None of the identified

² 47 C.F.R. § 0.459. The agreement contains trade secret information that is not publicly available, the disclosure of which would cause economic harm to Number Access.

³ The Company is not yet offering service, however is aware of its obligations to meet these requirements and intends to do so.

⁴ Because **Exhibit C** contains sensitive and confidential information relating to personnel and certain financial information related to Number Access, a privately-held limited liability company, the disclosure of which will likely cause competitive harm to Number Access, the Company requests that this information be filed under seal, pursuant to 47 C.F.R. § 0.459.

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.

G. § 52.15(g)(3)(i)(G)

Number Access 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), Number Access 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. Number Access 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)(i) of the Commission's Rules, Number Access, LLC respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

NUMBER ACCESS, LLC



Katherine E. Barker Marshall, Counsel
Potomac Law Group, PLLC
1300 Pennsylvania Ave NW, Suite 700
Washington, DC 20004
Telephone: (202) 792-6422
E-mail: kmarshall@potomaclaw.com

Date: March 5, 2018

Exhibit A

Agreement with Underlying CLEC

Confidential and Proprietary – Filed Under Seal

Pursuant to 47 C.F.R. §0.459

A copy of the Agreement is filed under seal.

Exhibit B

Interconnection Agreements

Confidential and Proprietary – Filed Under Seal

Pursuant to 47 C.F.R. §0.459

Number Access, LLC hereby submits copies of its underlying carrier's interconnection agreements and/or orders approving interconnection with the ILEC. The copies of these agreements and/or orders approving interconnection are filed under seal.

Exhibit C

Ownership and Managerial Information

Confidential and Proprietary – Filed Under Seal

Pursuant to 47 C.F.R. §0.459

Number Access's ownership, 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.

The following information contains confidential and proprietary information, the disclosure of which could cause competitive harm to the Applicant, and accordingly, is filed under seal.

[BEGIN CONFIDENTIAL INFORMATION]

[END CONFIDENTIAL INFORMATION]

DECLARATION

Christopher Finne, under penalty of perjury deposes and states as follows:

1. My name is Christopher Finne. I am a Managing Member of Number Access, LLC.
2. I have reviewed the information set forth in Number Access's Application to Obtain Numbering Resources to which this declaration is attached.
3. The statements set forth in Number Access's Application are true and correct to the best of my knowledge, information and belief.



Christopher Finne, Managing Member
Number Access, LLC

Dated: February 27, 2018