

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

In the Matter of Digital Network Access) WC Docket No. 21- _____
Communications, Inc. for Authorization to)
Obtain Numbering Resources Pursuant to)
Section 52.15(g) of The Commission's Rules)

APPLICATION OF DIGITAL NETWORK ACCESS COMMUNICATIONS, INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES

Digital Network Access Communications, Inc. (“DNA Communications” 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 voice over internet protocol (“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. DNA Communications is submitting the application in compliance with the STI-GA policy for service providers as established and administered by iconectiv. 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. DNA Communications hereby requests the Commission grant it that authorization. In support of this application, DNA Communications provides the following information:

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

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

A. § 52.15(g)(3)(i)(A)

Name: Digital Network Access Communications, Inc.
Address: 601 1st Avenue
City: Rochelle
State: IL
ZIP Code: 61068
Telephone: 815.562.4290

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

Name: Ahmed Kamel
Address: 601 1st Avenue
City: Rochelle
State: IL
ZIP Code: 61068
Telephone: 815.562.4290
Email: amkamel@dna-communications.com

B. § 52.15(g)(3)(i)(B)

DNA 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. The Company hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers.

DNA Communications is a competitive local exchange carrier in Illinois and has interconnection agreements in place for its primary geographic area to obtain DIDs and is experienced in the porting process. The numbering resources that are the subject of this Application will be used to provide interconnected VoIP services initially in neighboring states outside of its existing

competitive local exchange carrier geographic area in northern Illinois. In addition, there are rate centers in certain local exchange transport areas (“LTAs”) Illinois where it is difficult to port out of LATA numbers from existing carriers. For example, if those carriers do not have agreements covering a particular rate center, the port request will be rejected by the current carrier of record. This limits consumer choice and competition. Direct access to numbering authority by DNA Communications will resolve these types of problems.

C. § 52.15(g)(3)(i)(C)

DNA Communications 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)

DNA Communications hereby sets forth its capability to provide service within sixty (60) days of the numbering resources activation date. DNA Communications currently has interconnection agreements with former Verizon North Inc. and Verizon South Inc. in Illinois. The Company has equipment collocated in several central offices and trunks to access tandems to originate and terminate its customers’ voice traffic in its current LATA. As such, DNA Communications already has the experience to port numbers and efficiently transport traffic.

DNA Communications seeks numbering resource authority to expand outside of Illinois. The Company is negotiating agreements with Peerless Network and Inteliquent for the origination and termination of its customers’ traffic. Inteliquent has requested DNA Communications first

file this numbering authorization application before completing the contracts. Those contracts will be in effect within sixty days of this application's filing date. Peerless and Inteliquent are competitive local exchange carrier with dozens of interconnection agreements with incumbent local exchange carriers nationwide to carry voice traffic among access tandems and terminate to end user customers. DNA Communications will interconnect with and broadcast the appropriate carriers' tandem platforms for the purposes of managing all codes assigned to DNA Communications' OCN. This application will be supplemented with its traffic transport contracts as Exhibit 1. Relevant portions of Peerless' and Inteliquent's interconnection agreements to show facilities-readiness will be attached as Exhibit 2.

DNA Communications will also enter into agreements with Peerless and Inteliquent for access to DIDs outside of Illinois as well. The carriers provide PSTN transport and connectivity for inbound calls to these numbers. The service schedule will be attached as Exhibit 3.

E. § 52.15(g)(3)(i)(E)

DNA Communications 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.

F. § 52.15(g)(3)(i)(F)

The Company certifies that it has the financial, managerial, and technical expertise to provide reliable service. DNA Communications is financially stable, led by a strong, experienced team with substantial managerial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services. DNA Communications' management members and their biographies are listed below:

Ahmed Kamel

Mr. Kamel received degrees in economics and mathematics from the University of Arizona and then proceeded to privatize data communications networks in Kuwait building the only two fixed line broadband providers in the country in the late 1990s. After that Mr. Kamel joined a CLEC in rural North Carolina where his role was project management of 480 miles of fiber construction in northeastern North Carolina. He formed DNA Communications in June of 2003 as an IL corporation and in February of 2004 was able to complete a private placement memorandum that facilitated the capitalization of the company by July of 2004. Mr. Kamel testified before an Illinois administrative court judge to obtain its CLEC license and since then has been the Chairman and President of the company.

Mike Hammett

As the owner and Founder of Intelligent Computing Solutions, Mr. Hammett has been operating voice and data services over fixed wireless networks and joined DNA in 2017 to lead the engineering as acting CTO. In 2012, Mike and some of his colleagues started what would be the largest and longest WISP podcast with sponsorship from many vendors. In 2014, Mike joined

two friends in the formation of the Midwest Internet Exchange (now Fiber Data Internet Exchange). Its goal was to build internet exchanges in markets bypassed by the internet traffic points had ignored. That venture started in Indianapolis and has expanded into several markets across the United States, bringing the people closer to their content, increasing the quality of everyone's internet experience. In 2017, ICS and DNA joined forces and Mike joined DNA as its CTO leading the fiber deployment projects and taking over the management of DNA's network. Mike has developed DNA Communications' service offerings and further positioned the Company for future growth.

Renae Wilkinson

Renae has been the financial controller at DNA since 2015 and has assisted in providing regulatory filings both at USAC and with the Illinois Commerce Commission. Renae has a degree in Accounting from Northern Illinois University and is a certified professional accountant. She maintains financial controls and insures timely payment of bills and collections from customers.

None of the identified personnel above 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)

DNA 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), DNA 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 thirty (30) days of any changes. DNA 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)(i) of the Commission's Rules, DNA Communications respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

DIGITAL NETWORK ACCESS COMMUNICATIONS, INC.
through counsel,



Kristopher E. Twomey

Law Office of Kristopher E. Twomey, P.C.
1725 I Street, NW, Suite 300
Washington, DC 20006
202 681-1850
kris@lokt.net

Date: July 2, 2021

Exhibit 1

Exhibit 2

Exhibit 3