

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

In the Matter of )  
 )  
PAETEC iTEL, L.L.C., Applicant )  
For Authorization to Obtain Numbering ) WC Docket No. 20-\_\_\_\_\_  
Resources Pursuant to Section 52.15(g) of )  
the Commission's Rules )

**APPLICATION OF PAETEC iTEL, L.L.C. FOR  
INTERCONNECTED VOIP NUMBERING AUTHORIZATION**

PAETEC iTEL, L.L.C. (“Windstream IPES”), is a provider of interconnected voice over internet protocol (“iVoIP”) service, and files this application with the Federal Communications Commission (the “Commission”) for authorization to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (the “Numbering Administrators”) pursuant to Commission rule section 52.15(g)(3).<sup>1</sup>

In support of its Application, Windstream IPES provides the following information:

**1. Company Information.**

Address: 4001 N. Rodney Parham Road, Little Rock, AR 72212

General corporate telephone number: (501) 748-5000.

For purposes of this Application, inquiries pertaining to issues associated with 9-1-1, law enforcement, and general compliance with Commission rules can be directed to Carol Keith, Deputy General Counsel, by telephone at (847) 550-4433 or by electronic mail at carol.keith@windstream.com or Nicole Winters, Counsel II, by telephone at (501) 748-6313 or by electronic mail at nicole.winters@windstream.com.

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<sup>1</sup> 47 C.F.R. § 52.15(g)(3).

## **2. Acknowledgements.**

Windstream IPES acknowledges that:

- a. grant of the authorization sought by this Application 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; and
- b. it must file requests for numbers with the relevant State commissions at least thirty (30) days before requesting numbers from the Numbering Administrators.

## **3. Service Readiness.**

- a. Windstream IPES is capable of providing iVoIP service within sixty (60) days of the numbering resources activation date in accordance with Commission Rule Section 52.15(g)(2)<sup>2</sup> because its affiliates own and operate facilities for the provision of iVoIP services and it has secured an agreement with at least one third party network provider to use their network. Windstream IPES' and its affiliates have provided iVoIP services for several years and continue to provide those services. In addition to local voice and long distance services, Windstream IPES's iVoIP's affiliates portfolio includes but is not limited to: Office Suite UC<sup>3</sup> (a cloud-based phone and unified communications system) and Dynamic IP<sup>4</sup>. Windstream IPES' and its affiliates contribute to the Universal Services Fund ("USF") and Telecommunications Relay Services Fund ("TRS") applicable to the provision of services. Such services are offered to enterprise and medium size business customers via multiple sales channels, including its website

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<sup>2</sup> 47 C.F.R. § 52.15(g)(2).

<sup>3</sup> Office Suite product and service information available at <https://business.windstream.com/office-suite-uc#/>

<sup>4</sup> Dynamic IP product and service information available at <https://windstreamenterprise.com/wp-content/uploads/2018/02/wol-guide-for-voip.pdf>

at [www.windstreambusiness.com](http://www.windstreambusiness.com).

b. Windstream IPES, via its affiliates, owns and operates some of the network facilities it uses to serve its base of enterprise and mid-market business customers. In areas where neither Windstream IPES or its affiliates own and operate the networks Windstream IPES has secured an agreement with at least one third party for the use of their network. Numbers acquired directly from the Numbering Administrators will be used for customers subscribing to the services provided over these facilities. Windstream IPES is obtaining a separate operating company number (“OCN”) for its iVoIP services and will use this OCN to acquire numbers for its iVoIP services only, directly from the Numbering Administrators following grant of this Application. Once this Application is approved, affiliates of Windstream IPES intend to transfer some existing numbers to Windstream IPES.

#### **4. Certifications.**

Windstream IPES certifies to the following, as supported by the attached certification of Tim Loken, Director – Regulatory Reporting:

a. Windstream IPES complies with its USF contribution obligations under Commission Rule Part 54,<sup>5</sup> its TRSF contribution obligations under Commission Rule Section 64.604(c)(5)(iii),<sup>6</sup> its NANP and LNP administration contribution obligations under Commission Rule Sections 52.17 and 52.32,<sup>7</sup> its obligations to pay regulatory fees under Commission Rule Section 1.1154,<sup>8</sup> and its 911 obligations under Commission Rule Part 9.9.<sup>9</sup>

b. Windstream IPES possesses the financial, managerial, and technical expertise to

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<sup>5</sup> 47 C.F.R. Part 54, Subpart H.

<sup>6</sup> 47 C.F.R. § 64.604(c)(5)(iii).

<sup>7</sup> 47 C.F.R. §§ 52.17, 52.32.

<sup>8</sup> 47 C.F.R. § 1.1154.

<sup>9</sup> 47 C.F.R. Part 9.

provide reliable iVoIP service. Windstream IPES is a wholly owned subsidiary of Windstream Holdings II, LLC. The senior management of Windstream IPES has extensive experience in the telecommunications industry and offers widespread telecommunications business, technical and managerial expertise. Key management and technical personnel include, among others:

Tony Thomas, President & Chief Executive Officer  
Layne Levine, President – Enterprise  
Ron “Buddy” Bayer – Chief Network Officer  
Stephen Farkouh – Chief Information Officer

None of whom are currently or have previously been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

5. No party to the Application, as defined in Commission rule section 1.2002(b) is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.
6. Pursuant to Commission Rule Section 52.15(g)(3), Windstream IPES respectfully requests the Commission authorize it to obtain numbering resources directly from the Numbering Administrators.

Respectfully submitted,

**PAETEC iTEL, L.L.C.**

By:   
Carol Keith  
Deputy General Counsel  
4001 N. Rodney Parham Road  
Little Rock, AR 72212  
847-550-4433  
[Carol.Keith@windstream.com](mailto:Carol.Keith@windstream.com)

Dated: September 30, 2020

**Certification of**  
**Tim Loken, Director – Regulatory Reporting**

I certify as follows:

My name is Tim Loken and my business address is 4001 N. Rodney Parham Road, Little Rock, AR 72212. I am Director – Regulatory Reporting for Windstream Services II, LLC, the parent company of PAETEC iTEL, L.L.C. (“Windstream IPES”). I am authorized to provide this testimony on behalf of Windstream Services II, LLC and its subsidiary Windstream IPES.

In addition to local voice and long distance services, Windstream IPES will be capable of providing interconnected VoIP service, including but not limited to services like Office Suite UC (a cloud-based phone and unified communications system)<sup>10</sup> and Dynamic IP<sup>11</sup>. Such services are offered to enterprise and medium size business customers via multiple sales channels, including its website at [www.windstreambusiness.com](http://www.windstreambusiness.com).

1. Numbers acquired by authorization obtained through this application will be put into use within sixty (60) days.
2. Windstream IPES will comply with its USF contribution obligations under Commission Rule Part 54, its TRSF contribution obligations under Commission Rule Section 64.604(c)(5)(iii), its NANP and LNP administration contribution obligations under Commission Rule Sections 52.17 and 52.32, its obligations to pay regulatory fees under Commission Rule Section 1.1154, and its 911 obligations under Commission Rule Part 9.9.

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<sup>10</sup> OfficeSuite UC product and service information available at <https://business.windstream.com/office-suite-uc#/>.

<sup>11</sup> Dynamic IP product and service information available at <https://www.windstreamenterprise.com/wp-content/uploads/2018/02/wol-guide-for-voip.pdf>

3. Windstream IPES possesses the financial, managerial, and technical expertise to provide reliable interconnected VoIP service. Key management and technical personnel include, among others:

Tony Thomas, President & Chief Executive Officer  
Layne Levine, President – Enterprise  
Ron “Buddy” Bayer – Chief Network Officer  
Stephen Farkouh – Chief Information Officer

None of whom are currently or have previously been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

4. No party to the Application, as defined in Commission rule section I.2002(b), is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

The foregoing is true and correct based upon my personal knowledge, review of corporate and business records, and information provided to me by persons knowledgeable about Windstream IPES and its operations.

Executed on September 30, 2020



Tim Loken  
Director - Regulatory Reporting