

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

**Public Version –  
Confidential  
Information Excluded**

In the Matter of Noble Systems Communications LLC      )  
    )  
    WC Docket No. 20- \_\_\_\_\_  
For Authorization to Obtain Numbering                    )  
Resources Pursuant to Section 52.15(g) of                )  
The Commission's Rules                                        )

**APPLICATION OF NOBLE SYSTEMS COMMUNICATIONS LLC  
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Noble Systems Communications LLC (“Noble” 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*,<sup>1</sup> 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. Noble hereby requests the Commission grant it that authorization. In support of this application, Noble provides the following information:

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

**A. § 52.15(g)(3)(i)(A)**

Noble Systems Communications LLC  
1200 Ashwood Parkway, Suite 300  
Atlanta, GA 30338  
Telephone: (855) 716-6253  
Facsimile: (404) 851-1421  
Website: [www.noblesystemscommunications.com](http://www.noblesystemscommunications.com)

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

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

John B Simpson II, President  
Noble Systems Communications LLC  
1200 Ashwood Parkway, Suite 300  
Atlanta, GA 30338  
Telephone: (404) 851-1331 x1501  
Facsimile: (404) 851-1421  
E-mail: [jsimpson@noblesys.com](mailto:jsimpson@noblesys.com)

B. § 52.15(g)(3)(i)(B)

Noble 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 Georgia, however the Company anticipates that it will provide interconnected VoIP service nationwide, and accordingly, will request numbers from the other states in turn after its initial request in Georgia. Accordingly, to the extent required, Noble requests the Commission grant it authority to obtain numbering resources in all states.

C. § 52.15(g)(3)(i)(C)

Noble 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)

Noble hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. Noble has an agreement in place with a nationally recognized carrier partner, which has interconnection agreements in effect with all relevant incumbent local exchange carriers, in order to route traffic. A copy of this agreement is attached as ***Exhibit A*** to this application. Noble respectfully requests this agreement be accorded confidential treatment, pursuant to §0.459 of the

Commission's rules.<sup>2</sup> As ***Exhibit B***, Noble provides a current interconnection agreement between its carrier partner and an incumbent local exchange carrier ("ILEC").

In addition, the Company has a 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)

Noble 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.<sup>3</sup>

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.

Noble's key management and technical personnel are listed below, and more information concerning the managerial and team is included in ***Exhibit C***.<sup>4</sup> 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.

G. § 52.15(g)(3)(i)(G)

Noble hereby certifies that no party to this application is subject to a denial of Federal

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<sup>2</sup> 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 Noble.

<sup>3</sup> Noble's 499 Filer ID is 831220.

<sup>4</sup> Noble was granted International 214 Authority in File No. ITC-214-20160526-00159 on June 23, 2016 and has the same ownership structure as provided in that Application.

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), Noble 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. Noble 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, Noble Systems Communications LLC respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

**NOBLE SYSTEMS COMMUNICATIONS LLC**



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1300 Pennsylvania Ave NW, Suite 700  
Washington, DC 20004  
Telephone: (202) 792-6422  
E-mail: [kmarshall@potomaclaw.com](mailto:kmarshall@potomaclaw.com)

Date: May 28, 2020

**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**

Noble Systems Communications LLC hereby submits copies of its underlying carrier's interconnection agreement, filed under seal.

## **Exhibit C**

### **Managerial Information**

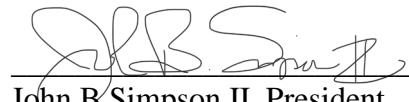
Noble's key management and technical personnel are listed below. None of the identified personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

Mr. John Simpson II has 25+ years expertise in the IT, contact center, and telecommunications space. He has been employed as the CIO of Noble Systems for the past 13 years and is the President of Noble Systems Communications, which is focused on providing telecommunications for contact centers, since its formation in 2016. He is well versed in telecommunications technology and holds numerous awards in the contact center space.

## **DECLARATION**

John Simpson, under penalty of perjury deposes and states as follows:

1. My name is John B. Simpson II. I am the President of Noble Systems Communications LLC.
2. I have reviewed the information set forth in the Company's Application to Obtain Numbering Resources to which this declaration is attached.
3. The statements set forth in Noble's Application are true and correct to the best of my knowledge, information and belief.



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John B Simpson II, President  
Noble Systems Communications LLC

Dated: May 27, 2020