



Steven A. Augustino

Kelley Drye & Warren LLP
Washington Harbour, Suite 400
3050 K Street, NW
Washington, DC 20007

Tel: (202) 342-8612
saugustino@kelleydrye.com

October 15, 2020

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Business Telecommunications Services, Inc., Second Supplement to the Application, *Application for Authority to Obtain Direct Access to Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules*, WC Docket No. 20-166

Dear Ms. Dortch:

Business Telecommunications Services, Inc. ("BTS"), by its counsel and pursuant to section 52.15(g)(3)(i) of the rules of the Federal Communications Commission (the "FCC" or "Commission"), submits this additional agreement ("Agreement") as a Second Supplement its previously filed application requesting authority to directly obtain numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator ("Application").¹ BTS respectfully requests that the Commission consider this Agreement in reviewing and granting the pending Application.

BTS's pending Application requests authorization to provide service in the area(s) for which the numbering resources are requested, and a grant of the Application would constitute such authority.² At the request of the Wireline Competition Bureau ("Bureau"), BTS filed a Supplement to its Application on September 30, 2020.³ Since that Supplement, BTS completed an additional Service Order with its carrier partner, Service Order – PSTN Control Service, to originate and terminate traffic to and from the Public Switched Telephone Network ("PSTN"). BTS now submits that Agreement for the Bureau's review as

¹ See *Business Telecommunications Services, Inc., Application for Authority to Obtain Direct Access to Numbering Resources Pursuant to 52.15(g) of the Commission's Rules*, WC Docket No. 20-166 (filed Jun. 11, 2020) ("BTS Application").

² 47 C.F.R. §52.15(g)(3).

³ See *Business Telecommunications Services, Inc., Application for Authority to Obtain Direct Access to Numbering Resources Pursuant to 52.15(g) of the Commission's Rules*, Supplement to Application, WC Docket No. 20-166 (filed Sept. 30, 2020) ("Supplement").

Ms. Marlene H. Dortch
October 15, 2020

further evidence of its ability to provide service within 60 days of the numbering resources activation date.⁴ BTS requests confidential treatment of the Agreement, in its entirety, and submits under separate cover a request for confidential treatment pursuant to Section 0.459 of the Commission's rules.

Please direct any questions as to this matter to the undersigned.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Steven A. Augustino". The signature is fluid and cursive, with a large initial "S" and "A".

Steven A. Augustino

*Counsel to Business Telecommunications
Services, Inc.*

cc: Jordan Marie Reth
Margaux Brown
Michele Sclater

⁴ 47 C.F.R. §52.15(g)(3)(i)(D).

Attachment

Service Order – PSTN Control Service

(confidential treatment requested)