

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

**Public Version –
Confidential
Information Excluded**

In the Matter of Phone.com, Inc.)
Application For Authorization to Obtain Numbering) WC Docket No. 21-_____
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

**APPLICATION OF PHONE.COM, INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

By this Application, Phone.com, Inc. (“Phone.com” or “Company”), an interconnected Voice over Internet Protocol (“VoIP”) provider, seeks to obtain direct access to numbering resources from the North American Numbering Plan Administrator and the Pooling Administrator (“Numbering Administrators”) pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules.¹

Phone.com provides the following information in support of this Application:

I. INFORMATION REQUIRED BY 47 C.F.R. § 52.15(g)(3)(i)

A. § 52.15(g)(3)(i)(A)

Phone.com, Inc.
184 So. Livingston Ave. Suite # 9-222
Livingston , NJ 07039
Telephone: (877) 746-6310
Facsimile: (973) 577-6384
Website: www.phone.com

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

Michael Robinson
VP Finance and Controller
Phone.com, Inc.
184 So. Livingston Ave. Suite # 9-222
Livingston , NJ 07039
Telephone: (877) 746-6310
Facsimile: (973) 577-6384
E-Mail: mrobinson@phone.com

¹ 47 C.F.R. § 52.15(g)(3).

B. § 52.15(g)(3)(i)(B)

Phone.com 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 California, and ultimately nationwide. Accordingly, to the extent required, Phone.com requests the Commission grant it authority to obtain numbering resources in all states.

C. § 52.15(g)(3)(i)(C)

Phone.com 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)

Phone.com hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. Phone.com has agreements in place with nationally recognized carrier partners that have interconnection agreements in effect with all relevant incumbent local exchange carriers in order to route traffic. Copies of its agreements are attached as *Exhibit A* to this Application. Phone.com respectfully requests that these agreements be accorded confidential treatment pursuant to Section 0.459 of the Commission's Rules.² As *Exhibit B*, Phone.com provides evidence of current interconnection agreements between its carrier partners

² 47 C.F.R. § 0.459. These agreements contain trade secret information that is not publicly available, the disclosure of which would cause competitive and economic harm to Phone.com.

and incumbent local exchange carriers (“ILECs”).

In addition, the Company has a back-office support system with the ability to schedule and process Local Number Portability (“LNP”) orders from customers, and has staff experienced in handling LNP between itself and other carriers and interconnected VoIP providers.

E. § 52.15(g)(3)(i)(E)

Phone.com hereby certifies that it will comply with its Universal Service Fund contribution obligations under 47 C.F.R. part 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 C.F.R. § 64.604(c)(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32, its obligations to pay regulatory fees under 47 C.F.R. § 1.1154, and its 911 obligations under 47 C.F.R. part 9.³

F. § 52.15(g)(3)(i)(F)

Phone.com certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, led by a strong, management team with substantial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable service.

Phone.com’s key management and technical personnel, along with their respective experience, are identified in *Exhibit C*. 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. Phone.com’s shareholder information is provided at *Exhibit D*.

G. § 52.15(g)(3)(i)(G)

Phone.com hereby certifies that no party to this Application is subject to a denial of Federal

³ Phone.com’s 499 Filer ID is 827009.

benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

II. ACKNOWLEDGEMENT OF CONDITIONS IN 47 C.F.R. § 52.15(g)(3)(iv)

As required by Section 52.15(g)(3)(iv), Phone.com 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.⁴ Phone.com 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, Phone.com, Inc. respectfully requests that the Commission grant this Application for authorization to obtain numbering resources.

Respectfully submitted,

PHONE.COM, INC.

By: 
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Date: January 28, 2021

⁴ 47 C.F.R. § 52.15(g)(3)(iv).

Exhibit A

Agreement with Underlying CLEC

Confidential and Proprietary – Filed Under Seal

Pursuant to 47 C.F.R. § 0.459

Exhibit B

Interconnection Agreements

Confidential and Proprietary – Filed Under Seal

Pursuant to 47 C.F.R. § 0.459

Exhibit C

Managerial Information

Phone.com'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.

Ari Rabban, Co-Founder and Chief Executive Officer

Co-Founder and CEO Ari Rabban is an IP communications industry veteran, with specific expertise in the start-up environment, moving companies from concept to operation. He joins Phone.com from Pulver Ventures, an incubator for new IT companies, where he served as managing director and vice president. Previously, Rabban served as vice president of corporate development and marketing for VocalTec Communications, the VoIP market pioneer and developer of the first Internet phone. During his tenure at VocalTec he served as president of two subsidiaries that were ultimately spun out: Surf and Call Solutions, one of the initial voice-enhanced ecommerce solutions companies, and Truly Global Inc., a web based communications service. Rabban joined VocalTec from Lucent Technologies. Frequently cited as a VoIP market expert, Rabban has been involved with the Internet telephony industry from its very early days; he has been widely quoted in trade publications and has been interviewed for media outlets around the world. Rabban is also a member of the board of directors of the NJTC. Rabban received an MBA from Carnegie-Mellon University; he also has a law degree and bachelors in economics from Tel Aviv University. He practiced corporate law in Tel Aviv, Israel prior to his arrival in the US. Preferred Return | Valuation of Phone.com, Inc.

Alon Cohen, Executive Vice President and Chief Technology Officer

Executive VP and CTO Alon Cohen is an entrepreneur, inventor and is widely recognized as one of the creators of the Voice over IP industry. He joins Phone.com after founding and managing a successful series of recent business ventures, including BitWine and RemoteAbility. Cohen was the co-founder of VocalTec Communications, the first company to provide Internet voice technology worldwide, which in 1996 was one of the earliest successful Internet IPOs. As an innovator Alon Cohen holds 4 US patents on different communications technologies, including the "Audio Transceiver" which is the basis for Voice over the Internet (VoIP) technology. The recipient of many awards and accolades for his innovative work including the "VoIP Visionary Award" (2005) from Pulvermedia. Cohen represented the State of Israel in the United Nations negotiations of the ITU Study Group 16 for the development and ratification of global VoIP standards. Alon was also named, by "The Marker", the leading Israeli Business Newspaper, as one of the "100 Most Influential Israelis" in Israel's High Technology history in September 2005. Cohen received an MBA and BSC.EE from Tel Aviv University, both Magna Cum Laude.

Michael Robinson VP Finance and Controller

Michael has worked every facet of finance across the telecom industry over the years. Previously he held Controller positions in banking and also worked internationally as an auditor with KPMG and PricewaterhouseCoopers. Michael is a CPA with a BA in Accounting from the University of Birmingham, UK.

Joel Maloff VP Channel Development

In his role with Phone.com Joel leads all channel and business development, Joel has been a frequent speaker at industry conferences on topics such as SIP trunking – Ready for Prime Time, Enhancing Quality of Experience via Network Planning, and IP Peer-to-Peer Networking. Joel has previously served as Senior Vice President of Sales and Marketing at BandTel, Senior Vice President of Corporate Strategies at GlobalTouch Telecom, and CTO at Fusion Telecom. Prior to joining Fusion, He was Principal Consultant for Maloff Group International and consulted for corporations in North America, South America, Asia, Europe, and Australia.

Brent Barbara SVP Business Development

Brent Barbara is the SVP of Business Development at Phone.com. With over three decades of experience in growth strategy and execution, Brent is responsible for driving growth with our fast-growing customer base across all regions. His role also allows him to craft unique editorial pieces, moderate conference panels, and leverage Phone.com's large footprint to foster greater brand-building and revenue-gaining opportunities. He holds a BA Economics from the University of Rochester.

Ian Honcharuk VP Software Engineering

Ian Honcharuk is the Director of Software Engineering at Phone.com, where he oversees and the development teams and the development of all of Phone.com's products. Ian brings more than two decades of experience in the tech industry as a founder, engineering, and business leader. He holds a BS in Computer Science from Stevens Institute of Technology.

Martin Viau VP New Products and Technology

Martin combines experience as a product innovator and software engineer who has worked with start-ups selling SaaS solutions and products primarily to SMB customers here in the US. Martin worked with SMB focused Shopkeep.com and ran their innovation lab where he created the API gateway, managed 3 acquisitions, as well as created a cloud-based functional delivery model. He is familiar with working in a high-availability, high-volume 24/7 environment- having worked for 14 years owning products in Finance (trading), and aviation, plus as an entrepreneur, having founded and raised VC funding for his own start-up (\$1.5MM successfully raised).

Exhibit D

Ownership Information

The following shareholders can assert a 10% or more fully diluted ownership interest in Phone.com:

Washington Technology Associates
c/o Michael Mann
102 NE 2nd Street, #217
Boca Raton, FL 33432
Percentage of Ownership: 28.6%
Principal Business: Investment Vehicle, wholly owned by Michael Mann,
a US Citizen
Citizenship: USA

TierraNet Inc.
P.O. Box 502010
San Diego, CA 92150-2010
Percentage of Ownership: 21.9%
Principal Business: Internet Services
Citizenship: USA

ff Venture Capital (through several different funds)
989 6th Ave, Floor 3
New York, NY 10018
Percentage of Ownership: 18.9%
Principal Business: Investment Fund
Citizenship: USA

No other entity can assert a 10% or more interest in Phone.com, Inc.

DECLARATION

Ari Rabban, under penalty of perjury deposes and states as follows:

1. My name is Ari Rabban. I am the Chief Executive Officer of Phone.com, Inc. (“Phone.com”).
2. I have reviewed the information set forth in Phone.com’s Application to Obtain Numbering Resources to which this declaration is attached.
3. The statements set forth in Phone.com’s Application are true and correct to the best of my knowledge, information, and belief.



Ari Rabban
Chief Executive Officer
Phone.com, Inc.

Dated: January 27, 2021