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April 30, 2021

## VIA ECFS & OVERNIGHT DELIVERY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Application of XCast Labs, Inc., For Authorization to Obtain Numbering Resources,  
Pursuant to Section 52.15(g), Docket No. 20-\_\_\_\_\_

Dear Ms. Dortch:

Pursuant to §52.15(g)(3)(i) of the Federal Communications Commission's ("Commission") Rules, enclosed please find a PUBLIC version of XCast Labs, Inc.'s ("XCast" or the "Company") Application For Authorization to Obtain Numbering Resources. **The CONFIDENTIAL version of this Application has been sent via overnight delivery to the Commission.**

Confidential treatment is requested for the documents and information provided in Exhibit B biographies of XCast's key personnel and Exhibit C Interconnection Agreement, pursuant to Section 0.459 of the Federal Communications Commission's (the "Commission") rules.<sup>1</sup> The confidential version is clearly marked in a separate envelope.

As required by Section 0.459(b) of the Commission's rules, XCast provides the following information regarding its request for confidential treatment:

1. Information regarding XCast's key personnel and Interconnection agreement are commercially sensitive and are privileged. The information is not generally publicly available.
2. The telecommunications industry is highly competitive, particularly in the provision of interconnected VoIP services.
3. The release of this information would give competitors access to privileged information that may affect the actions of those competitors. Competitors could utilize such information to extrapolate sensitive data.
4. XCast considers this information to be confidential and proprietary and does not distribute such information to any party outside of the company, with the exception of outside counsel.
5. This information is not available to the public and has not been disclosed to any other third party,

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<sup>1</sup> 47 C.F.R. §0.459

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with the exception of outside counsel.

6. The information should not be released for public inspection, as it contains proprietary company information that is competitively and financially sensitive. At some point, however, this information will become stale. At minimum, the information should be protected for not less than five (5) years.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the enclosed self-addressed, postage prepaid envelope. If you need any further information, please do not hesitate to contact us directly at (770) 232-9200 or via e-mail at [info@telecomcounsel.com](mailto:info@telecomcounsel.com).

Respectfully submitted,



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Enclosures

cc: Stephen Nelson

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

In the Matter of )  
                        )  
                        )  
**XCast Labs, Inc.**      )      WC Docket No. \_\_\_\_\_  
                        )  
                        )  
Application to Obtain Telephone Numbers      )  
Directly From the North American Numbering Plan Administrator and the Pooling Administrator      )  
Plan Administrator and the Pooling Administrator      )  
Administrator      )

**NUMBERING AUTHORIZATION APPLICATION**

XCast Labs, Inc. ("Applicant"), hereby applies for authorization to obtain telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (collectively, "Numbering Administrators") pursuant to and in accordance with Section 52.15 (g) of the Commission's rules. In support hereof, Applicant respectfully states:

1. Applicant's name, headquarters' address and telephone number are as follows:

XCast Labs, Inc.  
1880 Century Park East, Suite 1415  
Los Angeles, California 90067  
(310) 861-4700

2. The primary type of business of Applicant is telecommunications services, which includes interconnected VoIP. The numbering resources that are the subject of this Application will be used to provide interconnected VoIP services throughout the United States, including its territories and possessions.
3. The name and contact information for personnel of Applicant qualified to address issues relating to regulatory requirements, compliance with Commission rules, 911 and law enforcement is as follows:

Stephen Nelson, Senior Vice President, Operations  
[snelson@xcastlabs.com](mailto:snelson@xcastlabs.com); (310) 861-4770  
1880 Century Park East, Suite 1415, Los Angeles, CA 90067

4. Applicant acknowledges that the authorization is subject to compliance with applicable Commission numbering rules, numbering authority delegated to the states and industry guidelines and practices regarding numbering applicable to telecommunications carriers.

5. Applicant acknowledges that it must file requests for telephone numbers with the relevant state commissions at least thirty (30) days before requesting telephone numbers from the Numbering Administrators.
6. As proof of facilities readiness, namely that Applicant is capable of providing service within sixty (60) days of the numbering resources activation date, Applicant submits that it already has interconnection with the PSTN pursuant to a commercial arrangement that provides access to the PSTN; in particular, Applicant has an agreement with its carrier partners, Verizon and affiliates, who, in turn, have interconnection agreements in effect with all of the relevant local exchange carriers for the states that are the subject of the Application and in which such carriers provide access to the PSTN, including Verizon and its affiliates.
7. Applicant certifies that it complies 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, 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154 and its 911 obligations under 47 CFR part 9.
8. As demonstrated by its successful operations since 2000 as a nationwide VoIP provider, Applicant certifies that it possesses the financial, managerial, and technical expertise to provide reliable service. Attached hereto as Attachment A is the Applicant's Organizational Chart. Attached hereto as Attachment B are the names and descriptions of Applicant's key management and technical personnel. Applicant states that 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. Attached hereto as Attachment C is the excerpt from their agreement with Verizon needed for this authority.
9. Applicant certifies pursuant to Sections 1.2001 and 1.2002 of the Commission's rules 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. See 21 U.S.C. § 862.

*WHEREFORE*, Applicant respectfully requests the Commission to grant this Application for numbering resources.

Respectfully Submitted,



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**XCast Labs, Inc.**

**LIST OF EXHIBITS**

**EXHIBIT A**                      Organizational Chart

**EXHIBIT B**                      Biographies of Key Personnel

**EXHIBIT C**                      Interconnection Agreement

## **EXHIBIT A**

### Organizational Chart

XCast Labs, Inc. is a standalone company without any affiliates or subsidiaries.

**EXHIBIT B**

Biographies of Key Personnel

**CONFIDENTIAL AND PROPRIETARY**

**REDACTED IN ENTIRETY**

**EXHIBIT C**

Interconnection Agreement

**CONFIDENTIAL AND PROPRIETARY**

**REDACTED IN ENTIRETY**