

November 21, 2024
Via ECFS Filing
REDACTED FOR PUBLIC INSPECTION

Secretary, Federal Communications Commission
Washington, DC 20554
Attn: Wireline Competition Bureau

RE: Request for Confidential Treatment of Filing of ALLO Communications LLC; Supplemental Application of ALLO Communications LLC for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 24-135

Dear Ms. Dortch,

Pursuant to Section §52.15(g)(3)(ii) of the Commission's Rules,¹ ALLO Communications LLC ("ALLO Communications") hereby submits its Supplemental Application for Authorization to Obtain Numbering Resources.

ALLO Communications respectfully requests that, pursuant to Sections §0.457 and §0.459 of the Commission's Rules,² the Commission withhold from public inspection and accord confidential treatment to **Exhibits A and C** to the application because that document contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").³ Moreover, ALLO Communications would suffer substantial competitive harm if this information were disclosed.

Exhibits A and C are accordingly marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT - NOT FOR PUBLIC INSPECTION."

In support of this request, ALLO Communications hereby states the following:

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT.

ALLO Communications seeks confidential treatment of **Exhibits A and C** to its Application.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.

ALLO Communications is submitting as **Exhibit A** the agreement between its carrier partner as proof of ALLO Communications' facilities readiness as required by Section 52. 15(g)(3)(i)(D) of

¹ 47 C.F.R. § 52.15(g).

² 47 C.F.R. § 0.457 & §0.459.

³ See 5 U.S.C. § 552(b)(4). Public disclosure is not required for "trade secrets and commercial or financial information obtained from a person and privileged or confidential."

the Commission's Rules. ALLO Communications is submitting as **Exhibit C** its Service Schedule as proof that it complies with the 911 and 988 obligations under part 9 of the relevant chapter.

3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED.

The information for which ALLO Communications seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors". **Exhibit A** describes the agreement between ALLO Communications and its carrier partner and contains proprietary commercial information concerning ALLO Communications' network, customers, and services. **Exhibit C** outlines the ALLO Communications compliance with its 911 and 988 obligations which contain proprietary information concerning ALLO Communications network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERN'S A SERVICE THAT IS SUBJECT TO COMPETITION.

Exhibit A contains information relating to commercial matters which can be used by other interconnected VoIP providers to compromise ALLO Communications' position in the highly competitive interconnected VoIP business sector. Detailed operations and commercial information of the type provided by ALLO Communications could compromise ALLO Communications' position in this highly competitive industry. Accordingly, release of this information would result in substantial competitive harm to ALLO Communications.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.

Competitors could use ALLO Communications' proprietary commercial and operational information to ALLO Communications' detriment as they would gain access to sensitive information concerning ALLO Communications' commercial agreements, as well as information as to how ALLO Communications provides its services. The prices and terms for the provision of such services are a substantial differentiator between competing carriers. Therefore, disclosure of the Carrier Agreement would result in significant competitive harm to ALLO Communications' carrier partner. This information is not normally disclosed to the public.

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.

ALLO Communications has not distributed the information in **Exhibits A or C** to the public; ALLO Communications is prohibited by contract from publicly disclosing the Carrier Agreement, except as expressly authorized by the carrier partner.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES.

ALLO Communications does not believe that the Carrier Agreement or Service Schedule is available to the public or that the Carrier Agreement or Service Schedule has ever been disclosed to third parties absent the protection of a non-disclosure agreement regarding their contents.

8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE.

ALLO Communications requests that **Exhibits A and C** be withheld from public disclosure indefinitely. ALLO Communications and its carrier partner intend for the Carrier Agreement to remain in effect indefinitely and therefore any disclosure of the Carrier Agreement or their substance would cause competitive harm to ALLO Communications' carrier partner regarding of the timing of the disclosure.

9. OTHER INFORMATION THAT ALLO COMMUNICATIONS BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.

The information concerns ALLO Communications' proprietary network information, related to current and planned commercial and operational information, and as such, is commercially sensitive.

For the foregoing reasons, ALLO Communications respectfully requests the Carrier Agreement be granted confidential status and withheld from public inspection.

The \$1485 filing fee has been remitted using the CORES fee payment system.

Any questions you may have regarding this filing should be directed to my attention at 470-672-3933 or via email to nfernandez@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez
Consultant

tms: FCCv2400

NF/ec

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

In the Matter of)
)
ALLO Communications LLC For)
Authorization to Obtain Numbering) WC Docket No. 24-135
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

**SUPPLEMENTAL INFORMATION TO APPLICATION OF ALLO COMMUNICATIONS LLC
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

ALLO Communications LLC (“ALLO Communications”) pursuant to Section 52.15(g)(3)(ii) of the Commission’s Rules, respectfully submits supplemental information authorization to obtain numbering as described below. The purpose of this filing is to update the application originally filed on April 30, 2024. This updated application is based upon emails and discussions with FCC staff.

Under the Commission’s *Numbering Order*,¹ 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)(ii)(A)-(N) of the Commission’s Rules. ALLO Communications hereby requests the Commission grant it that authorization. In support of this application, ALLO Communications provides the following information:

I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(ii)

A. § 52.15(g)(3)(ii)(A)

Name: ALLO Communications LLC
Address: 330 S 21st ST
City: Lincoln
State: Nebraska
ZIP Code: 68510

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

Country: U.S.A.
Telephone: (844) 560-2556
Website: <https://www.allocommunications.com/>

Contact for Regulatory Requirements:

Name: Andrew Vinton
Address: 330 S 21st ST
City: Lincoln
State: NE
ZIP Code: 68510
Country: U.S.A.
Telephone: 402-781-4698
E-mail Address: andrew.vinton@allofiber.com

Compliance, 911, and Law Enforcement:

Name: Allison O'Neil
Address: 330 S 21st ST
City: Lincoln
State: NE
ZIP Code: 68510
Country: U.S.A.
Telephone: 308-633-7814
E-mail Address: allison.oneil@allofiber.com

B. § 52.15(g)(3)(ii)(B)

ALLO Communications 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. ALLO Communications 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 the state of Nebraska.

C. § 52.15(g)(3)(ii)(C) & (G)

ALLO Communications hereby 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. ALLO Communications is committed to providing full support for their customers

concerning Robocall Mitigation and call Blocking where appropriate. The Company certifies that it will not use the numbers obtained pursuant to an authorization to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 et seq. of this chapter, and 16 CFR 310.3(b).

D. § 52.15(g)(3)(ii)(D) & (H)

ALLO Communications hereby sets forth its capability to provide service within 60 days of the numbering resources activation date.

To demonstrate its facilities' readiness, ALLO Communications will have the following resources available at its disposal: a fully integrated back-office support system with the ability to schedule and process LNP orders from customers and an experienced provisioning department capable of handling bulk number ports with over 17 years LNP experience. ALLO Communications has an agreement in place with a carrier partner to route traffic to the ILECs. In its original application, ALLO Communications attached, as *Exhibit A*, an agreement between ALLO Communications and its carrier partner providing that the carrier partner will host ALLO Communications' numbers on its switches and provide connectivity to the PSTN for inbound calls to ALLO Communications numbers. With this supplement ALLO Communications submits supplemental information to *Exhibit A*. ALLO Communications has requested confidential treatment under the Commission's rules for *Exhibit A*. Also attached, as *Exhibit B*, is evidence of interconnection agreements between ALLO Communications' carrier partner and the local exchange carriers in the state of Nebraska.

STIR/SHAKEN compliant - ALLO Communications has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 to 64.6305. The Company will provide the necessary "KYC" documentation for their customers as required by STI-GA Authorities.

In addition, ALLO Communications will pass the STIR/SHAKEN certificate, without modification, to each carrier with which it exchanges call traffic.

E. § 52.15(g)(3)(ii)(E)

ALLO Communications hereby certifies that it complies with its 911 and 988 obligations under part 9 of the relevant chapter. Please see *Exhibit C*. ALLO Communications has requested confidential treatment under the Commission's rules for *Exhibit A*. The Company also complies with the provisions of the Communications Assistance with Law Enforcement Act, 47 U.S.C. 1001 et seq. (CALEA)

F. § 52.15(g)(3)(ii)(F)

ALLO Communications hereby certifies that it complies with the Access Stimulation rules under §51.914.

G. § 52.15(g)(3)(ii)(I)

ALLO Communications submits as *Exhibit D* proof of filing its FCC Forms 477 and 499.

H. § 52.15(g)(3)(ii)(J)

ALLO Communications hereby 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 and 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9.

I. § 52.15(g)(3)(ii)(K)

ALLO Communications 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 numbering services. ALLO Communications' 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, including the Commission's rules in this chapter applicable to unlawful robocalls or unlawful spoofing.

Key Personnel:

Brad Moline – Chief Executive Officer
Don Schoening – Chief Field Services Officer
Nate Buhrman – Chief Financial Officer
Allison O'Neil – Chief Experience Officer
Todd Heyne - Chief Construction Officer

J. § 63.18(h) & (i)

ALLO Communications is not affiliated with any foreign carrier or has any interlocking directorates with a foreign carrier.

K. § 52.15(g)(3)(ii)(M)

ALLO Communications hereby certifies 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, 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), ALLO Communications 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. ALLO Communications 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) of the Commission's Rules, ALLO Communications respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

/s/ Nelson Fernandez
Nelson Fernandez – Consultant & Technical Implementation Manager
Inteserra, Inc.
(470) 672-3933
nfernandez@inteserra.com

November 21, 2024

Exhibit A

AGREEMENT BETWEEN
ALLO COMMUNICATIONS AND CARRIER PARTNER
(Confidential exhibit submitted separately)

Exhibit B

(Please See Original Filing)

Exhibit C
(Confidential exhibit submitted separately)

Exhibit D

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Filer Identification Information:

No Longer Active as of .

Replaced by filer: [_](#)

Historical Data:

499 Filer ID Number:	824034
Registration Current as of:	4/1/2024
Legal Name of Reporting Entity:	Allo Communications, LLC
Doing Business As:	Allo Communications, LLC
Principal Communications Type:	CAP/LEC
Universal Service Fund Contributor:	Yes
(Contact USAC at 888-641-8722 if this is not correct.)	
Holding Company:	
Registration Number (CORESID):	0010480978
Management Company:	
Headquarters Address:	330 S 21st Street
City:	Lincoln
State:	NE
ZIP Code:	68510
Customer Inquiries Address:	330 S 21st Street
City:	Lincoln
State:	NE
ZIP Code:	68510
Customer Inquiries Telephone:	866-481-2556 Ext:
Other Trade Names:	Allo Communications

Agent for Service of Process:

Local/Alternate Agent for Service
of Process:

Telephone:
Extension:
Fax:
E-mail:

Business Address of Agent for

Mail or Hand Service of Documents:

City:
State:
ZIP Code:

D.C. Agent for Service of Process: **CT Corporation System**
CT Corporation System

Telephone: **202-393-1747**
Extension: **202-393-1760**
Fax: **info@ctadvantage.com**

Business Address of D.C. Agent for
Mail or Hand Service of Documents: **1025 Vermont Avenue, NW**
Washington
DC
20005

FCC Registration Information:

Chief Executive Officer: **Bradley Moline**
Business Address: **610 Broadway**
PO Box 1123
City: **Imperial**
State: **NE**
ZIP Code: **69033**

Chairman or Other Senior Officer: **Allison O'Neil**
Business Address: **610 Broadway**

PO Box 1123
City: Imperial
State: NE
ZIP Code: 69033

President or Other Senior Officer: **Nate Buhman**
Business Address:
City: Lincoln
State: NE
ZIP Code: 68510

Jurisdictions in Which the Filing Entity Provides Telecommunications Services:

Colorado
Nebraska

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Washington, DC 20554
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Submission Overview

ERN: 0010480978 | Service Provider | Allo Communications LLC

SUBMISSION CERTIFIED

Data as of June 30, 2024

Biannual Filing Window

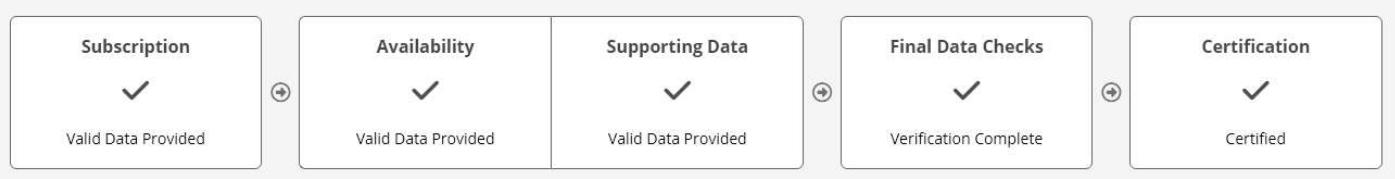
DATA AS-OF DATE	WINDOW OPEN	WINDOW STATUS
Jun 30, 2024	Jul 1, 2024	CLOSED
TODAY'S DATE	WINDOW CLOSE	FILING STATUS
Oct 2, 2024	Sep 3, 2024	Original - Certified

Fixed Data Requests

Fixed Challenges	0
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Submission Steps

Decertify Submission



Fixed Submission Data

Service	Subscription Data	Availability Data	
	Subscribers	Locations	Supporting Data
Fixed Broadband	123,127	310,002	✓ 1 of 1
Fiber to the Premises	123,127	310,002	✓ 1 of 1
Fixed Voice	50,024		
Non-ILEC	50,024		

Verification

I swear under penalty of perjury that I am Brad Moline, an officer of the above-named applicant, ALLO Communications LLC, and that I have examined the foregoing submissions, and previously filed supplements and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.



/s/Brad Moline

Brad Moline, CEO