

# BRONSTON LEGAL PC

## Attorneys at Law

Benjamin W. Bronston

Charles L. Carr

4615 Southwest Freeway, Suite 350

Houston, Texas 77027

Phone: (713) 778-1000

Fax: (713) 664-7017

October 8, 2020

### **VIA ECFS AND CERTIFIED MAIL**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: Application of Comtel Managed Solutions, LLC For Authorization to Obtain Numbering Resources

Dear Ms. Dortch,

Pursuant to §52.15(g)(3)(i) of the Federal Communications Commission’s (“Commission”) Rules, Comtel Managed Solutions, LLC (“Comtel”) hereby submits its Application For Authorization to Obtain Numbering Resources.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

s/Benjamin W. Bronston

Benjamin W. Bronston

Bronston Legal, PC

4615 Southwest Freeway, Suite 350

Houston, TX 77027

Telephone: (713) 723-3000

E-mail: bbronston@telecomlawyer.net

**PUBLIC VERSION**

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

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

**APPLICATION OF COMTEL MANAGED SOLUTIONS, LLC**  
**FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Comtel Managed Solutions, LLC (“Comtel” 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. Comtel hereby requests the Commission grant it that authorization. In support of this application, Comtel provides the following information:

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

**A. § 52.15(g)(3)(i)(A)**

Name: Comtel Managed Solutions, LLC  
Address: 1129 Gaskins Road, Suite 200  
City: Henrico  
State: VA  
ZIP Code: 23238

---

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

Telephone: 855-247-8686  
Website: [www.comtelcom.com](http://www.comtelcom.com)

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

Name: Ben Humphreys, Chief Executive Officer  
Address: 1129 Gaskins Road, Suite 200  
              Henrico, VA 23238  
Telephone: (804) 201-4438  
E-mail: [BHumphreys@simplicityvoip.net](mailto:BHumphreys@simplicityvoip.net)

B. § 52.15(g)(3)(i)(B)

Comtel 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 Florida, 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 Florida. Accordingly, to the extent required, Comtel requests the Commission grant it authority to obtain numbering resources in all states.

C. § 52.15(g)(3)(i)(C)

Comtel 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)

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

Comtel respectfully requests this agreement be accorded confidential treatment, pursuant to §0.459 of the Commission's rules.<sup>2</sup> As *Exhibit B*, Comtel provides a current interconnection agreement between its carrier partner and an incumbent local exchange carrier ("ILEC").

In addition, the Company has developed an integrated 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)

Comtel 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.

---

<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 Quality Voice.

<sup>3</sup> Quality Voice's 499 Filer ID is 863267.

Comtel's key management and technical personnel are listed below, and more information concerning the managerial and team is included 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.

G. § 52.15(g)(3)(i)(G)

Comtel 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), Comtel 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. Comtel 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, Comtel Managed Solutions, LLC respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

**COMTEL MANAGED SOLUTIONS, LLC**

*s/Benjamin W. Bronston*

Benjamin W. Bronston  
Bronston Legal, PC  
4615 Southwest Freeway, Suite 350  
Houston, TX 77027  
Telephone: (713) 723-3000  
E-mail: bbronston@telecomlayer.net

Date: October 8, 2020

**Exhibit A**

**Agreement with Underlying CLEC**

**Confidential and Proprietary – Filed Under Seal**

**Pursuant to 47 C.F.R. §0.459**

**REDACTED**

Exhibit B

**Interconnection Agreement**

**Confidential and Proprietary – Filed Under Seal**

**Pursuant to 47 C.F.R. §0.459**

**REDACTED**

## Exhibit C

### Managerial Information

Comtel Communications Inc. is a New York corporation and has an affiliate company Comtel Managed Solutions, LLC, a Virginia limited liability company doing business under the Fictitious Name Certificate of "Simplicity VoIP". Simplicity VoIP's 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.

#### **Benjamin R. Humphreys, Jr.**

Benjamin Humphreys, Jr. is the President and CEO Simplicity VoIP, Comtel Managed Solutions, LLC and Comtel Communications.

Ben founded Comtel Communications in 1991 as a regional agency focused on voice and data services. The firm has grown and evolved over the years to become a trusted Master Agency and resource for customers looking for turnkey technology solutions.

In 1996, Mr. Humphreys helped found the Agent Alliance, a forward-thinking consortium of like-minded organizations that foster best practices among technology solutions organizations. His vision was to blend the talents of similar telecom firms to maintain cutting-edge opportunities for clients.

In 2012 Mr. Humphreys launched Simplicity VoIP to provide a high-touch, on-site hosted VoIP experience. Today, Simplicity continues with its mission providing hosted PBX, VoIP and, business telephone solutions nationally to small, medium, and enterprise-level businesses for a comprehensive, unified communications experience.

Named as Richmond's 11th fastest growing company by Richmond BizSense, Simplicity VoIP's key to success is its on-site service, installation, and training supported 24/7/365 by a world-class client services team.

Ben serves on numerous community boards including Richmond's Beth Shalom Continuing Care and Retirement Community and Virginia Commonwealth Bank's Financial Group.

Ben earned his B.S. in Marketing from Virginia Commonwealth University.

[bhumphreys@simplicityvoip.net](mailto:bhumphreys@simplicityvoip.net)

#### **Larry Sims**

Larry Sims is the Vice President of Network Engineering. His overall career in technical support and management extends beyond 26 years. Before serving with the Simplicity team, he

worked at Windstream for 16 years as a technician specializing in fiber optics. Currently, in his 6th year at Simplicity VoIP, Larry was recently promoted to VP of Network Engineering. His responsibilities are the oversight of Simplicity's Class-5 netsapiens VoIP switch as well as the development of new features and functionality for the Simplicity platform. Larry's priorities extend to Simplicity's software upgrades, platform continuity, and management of the Client Services team.

### **Lenada Crabb**

Lenada Crabb is the Director of Client Services for Simplicity VoIP. Lenada has been with Comtel Communications and Simplicity for 15 years in the client services department. She started as a part-time rep but quickly became a full-time employee due to her technical and excellent customer service skills. Lenada truly excelled at proactive troubleshooting and providing solutions to customer questions.

Recently promoted as Simplicity's Director of Client Services, Lenada is now responsible for the management of the Client Services team. Additionally, her focus entails all aspects of provisioning, porting, post-sales troubleshooting, as well as the coordination of repair support for Simplicity's clients.

She earned her BS degree from Old Dominion University.

## **DECLARATION**

Ben Humpheys, under penalty of perjury deposes and states as follows:

1. My name is Ben Humphreys. I am Chief Executive Officer of Comtel Managed Solutions, 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 Comtel's Application are true and correct to the best of my knowledge, information, and belief.



\_\_\_\_\_  
Ben Humphreys, Chief Executive Officer  
Comtel Managed Solutions, LLC

Dated: October 1, 2020