

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

*In the Matter of* )  
                            )  
                            )  
Telnyx LLC, Applicant     )     WC Docket No. 15-\_\_\_\_\_  
                            )  
                            )  
For Authorization to Obtain Numbering     )  
Resources Pursuant to Section 52.15(g) of     )  
the Commission's Rules         )

**APPLICATION OF TELNYX LLC FOR AUTHORIZATION TO OBTAIN  
NUMBERING RESOURCES**

Telnyx LLC (“Telnyx”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requests authorization to obtain numbering resources 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 Sections 52.15(g)(3)(i)(A)-(F) of the Commission’s Rules. Telnyx hereby requests the Commission grant it that authorization. In support of this application, Telnyx states that its OCN is 073H and that the numbers will be primarily used in providing voice over Internet protocol services. It also provides the following information:

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

**(A) § 52.15(g)(3)(i)(A)**

**Name:** Telnyx LLC  
**Address:** 212 West Superior St., Suite 200,  
**Telephone:** Chicago, IL 60654

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

**Qualified Personnel:** David Casem, Chief Executive Officer, Chief Technical Officer  
Ian Reither, Chief Operating Officer

**(B) § 52.15(g)(3)(i)(B)**

Telnyx 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. Telnyx also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers.

**(C) § 52.15(g)(3)(i)(C)**

Telnyx 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)**

Telnyx is fully capable of providing service within 60 days of the numbering resources activation date. Telnyx has an OCN, appears in the LERG and NPAC in the IPES category, has an agreement in place with its CLEC partner for routing traffic to ILECs, and has, in some cases, negotiated direct IP interconnection with ILECs. In addition, Telnyx has developed porting processes to enable carriers to submit porting requests and has accomplished bulk ports with no difficulty. As a result, Telnyx already has in place the necessary procedures to enable it to place numbers into service within 60 days of activation. Under its current agreements and established procedures, Telnyx will be able to place nearly all numbers into service within 60 days of activation.

As proof of its facilities readiness, Telnyx has attached to this application (1) an agreement between Telnyx and its carrier partner providing that the carrier partner will host

Telnyx numbers on its switches and provide PSTN connectivity for inbound calls to Telnyx numbers and (2) an interconnection agreement between Telnyx's carrier partner (under a previous company name) and a local exchange carrier. These documents are Exhibits A and B to this application. Telnyx has requested confidential treatment under the Commission's rules for both Exhibits and has filed them separately.

**(E) § 52.15(g)(3)(i)(E)**

Telnyx 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.

**(F) § 52.15(g)(3)(i)(F)**

Telnyx certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, is led by a strong, experienced team of individuals with substantial managerial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services.

Telnyx has the financial stability required to ensure the reliable provisioning of its communications services, including numbering, throughout its service area. Telnyx has successfully operated its communications business since 2009. It anticipates much of the funding for its network buildout and operations will come from revenues from existing operations, as well as a debt facility with Comerica Incorporated.

One factor in this long-term stability has been Telnyx's consistent fulfillment of its regulatory obligations and membership in the regulated community. Telnyx remains in good

regulatory standing with the FCC and possesses an FCC authorization under Section 214 of the Communications Act.

Telnyx also has the superior technical and managerial qualifications necessary to provide and maintain successful operations within its service area. The company is a Tier II Internet Service Provider that currently operates its own private fiber backhaul network with points of presence in three of the busiest Internet hubs globally: San Jose, CA, Chicago, IL, and Ashburn, VA. Telnyx owns and manages a substantial amount of IP address space, is a participant on numerous Internet Exchanges, and physically interconnects with the four largest public cloud operators in the world. Telnyx also successfully passes IP voice traffic directly to several large carriers, including Verizon, AT&T, Windstream and Comcast. These interconnections, combined with its own private network, provide Telnyx with the capability to ensure the continued provisioning of quality services to customers.

Telnyx's management team has extensive business and network management experience in telecommunications-related businesses and in serving its targeted customer segment – telecommunications carriers, IP service providers, and enterprises. These individuals lead a team of 20+ network, telephony, and software engineers that is highly qualified to manage the operations of Telnyx throughout its service area. Telnyx'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.

**Key Personnel:**      David Casem, Chief Executive Officer, Chief Technology Officer  
                                  Ian Reither, Chief Operating Officer  
                                  Rogelio Perez, Senior Telephony Engineer  
                                  Jason Craft, Senior Network Engineer, CCIE #37524

(G)      § 52.15(g)(3)(i)(G)

Telnyx 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), Telnyx 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. Telnyx will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

## **CONCLUSION**

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, Telnyx respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,



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*Counsel to Telnyx LLC*

May 13, 2016

## EXHIBIT A

[Confidential exhibit submitted separately.]

## EXHIBIT B

[Confidential exhibit submitted separately.]