

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

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

**APPLICATION OF MOBILESPHERE LLC,**  
**FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

MobileSphere LLC (“MobileSphere”), 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 voice over internet protocol (“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. MobileSphere is submitting the application in compliance with the STI-GA policy for service providers as established and administered by iconectiv. 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. MobileSphere hereby requests the Commission grant it that authorization. In support of this application, MobileSphere provides the following information:

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

**A. § 52.15(g)(3)(i)(A)**

Name: MobileSphere, Inc.  
Address: 7 Faneuil Hall Marketplace  
City: Boston  
State: MA  
ZIP Code: 02109  
Telephone: 617.399.9980

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

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

Name: Toufic Mobarak  
Address: 7 Faneuil Hall Marketplace  
City: Boston  
State: MA  
ZIP Code: 02109  
Telephone: 617.399.9980  
Email: toufic@mobile-sphere.com

**B. § 52.15(g)(3)(i)(B)**

MobileSphere 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 Massachusetts. Customers will use a mobile VoIP application being developed by MobileSphere to initiate and receive VoIP calls similar to non-interconnected VoIP providers Skype and WhatsApp, but with a traditional telephone number assigned to the customer for interconnected VoIP.

**C. § 52.15(g)(3)(i)(C)**

MobileSphere 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)**

MobileSphere hereby sets forth its capability to provide service within sixty (60) days of the numbering resources activation date. MobileSphere provides mobile communications and mobile messaging solutions to enterprises, non-profit organizations, and consumers. Among its customers are respected entities such as Chipotle, Mary Kay, eHarmony, KellerWilliams, Make A Wish Foundation and Princeton University. Founded in 2003, MobileSphere pioneered the wireless international long-distance market with its CellularLD solution, enabling U.S. consumers to place low-cost overseas calls from a mobile phone. Shortly thereafter, MobileSphere began partnering with major universities, enterprises and wireless carriers to develop and launch tailored international calling solutions for mobile users. The company has been featured in the Washington Post, New York Times, and PCWorld for its innovative services. More information about the company can be found at [www2.mobile-sphere.com](http://www2.mobile-sphere.com)

In 2009, MobileSphere created the concept of ringless voice messaging and entered the market with slydial. Slydial is a voice messaging solution that enables consumers to connect directly to another person's mobile voicemail. MobileSphere filed and was awarded the patent on the ringless voicemail technology, shortly thereafter. Following the success of slydial, MobileSphere launched slybroadcast in 2014. Slybroadcast allows for one audio messages to be delivered directly to the voicemail-box of thousands of mobile phones. One of the application's uses is to instantly provide public safety announcements. Recently, MobileSphere entered the multimedia messaging market with slyText, the industry's first two-way web-to-mobile multimedia messaging service enabling interactive, real-time communications from the web to mobile phones.

The Company has an agreement in place with Inteliquent for the termination of its customers' traffic. Inteliquent is a competitive local exchange carrier with dozens of interconnection agreements with incumbent local exchange carriers nationwide to carry voice traffic among access tandems and terminate to end user customers. Relevant portions of Inteliquent's interconnection agreement with Verizon New England is attached as Exhibit A. MobileSphere will interconnect with and broadcast the appropriate carriers' tandem platforms for the purposes of managing all codes assigned to MobileSphere's OCN.

MobileSphere has also entered into an agreement with Inteliquent for access to DIDs. Inteliquent provides PSTN connectivity for inbound calls to these numbers. The service schedule is attached as Exhibit B.

**E. § 52.15(g)(3)(i)(E)**

MobileSphere 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.

**F. § 52.15(g)(3)(i)(F)**

The Company certifies that it has the financial, managerial, and technical expertise to provide reliable service. MobileSphere is financially stable, led by a strong, experienced team with substantial managerial experience in the telecommunications industry, and has sufficient

technical expertise and infrastructure in place to provide reliable numbering services.

MobileSphere's management members and their biographies 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.

**G. § 52.15(g)(3)(i)(G)**

MobileSphere 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), MobileSphere 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 thirty (30) days of any changes. MobileSphere 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, MobileSphere respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

**MOBILESPHERE, INC.**  
through counsel,

A handwritten signature in blue ink, appearing to read "Kris Twomey".

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Kristopher E. Twomey

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Date: August 7, 2020