

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

<i>In the Matter of</i>)	
)	
Zoom Voice Communications, Inc.,)	
Applicant,)	
)	WC Docket No. 20-419
For Authorization to Obtain Numbering)	
Resources Pursuant to Section 52.15(g))	
of the Commission's Rules)	
)	

REPLY COMMENTS OF ZOOM VOICE COMMUNICATIONS, INC.

Kari Zeni
Associate General Counsel
ZOOM VOICE COMMUNICATIONS, INC.

Brita D. Strandberg
Daniel P. Tingley
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street, NW, 8th Floor
Washington, DC 20036
(202) 730-1300

Counsel to Zoom Voice Communications, Inc.

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Zoom Voice Communications, Inc. (“Zoom”) submits this response to comments filed by CarrierX regarding Zoom’s application for authorization to obtain numbering resources.¹ The Commission’s rules provide that the Bureau may remove an application from streamlined processing if (1) an applicant fails to respond promptly to Commission inquiries; (2) an application is associated with a non-routine request for waiver of the Commission’s rules; (3) timely-filed comments on the application raise public interest concerns that require further Commission review; or (4) the Bureau determines that the application requires further analysis to determine whether granting the application serves the public interest. 47 C.F.R. § 52.15(g)(3)(iii). None of these conditions are met here. The comments filed by CarrierX raise no public interest concerns related to Zoom’s application that merit further review by the Commission. The Commission should therefore continue to process the application on a streamlined basis and deem the application granted pursuant to Section 52.15(g)(3)(iii).

Zoom filed an application to obtain numbering authorization from the Commission on December 9, 2020.² On February 5, 2021, the Commission issued a Public Notice stating that Zoom’s application contained the information required by the Commission’s rules and finding the application “upon initial review, to be acceptable for filing as a streamlined application.”³ Only one party, CarrierX, filed comments on Zoom’s application. CarrierX did not identify any defects in Zoom’s application or raise any issues about Zoom that present public interest

¹ Comments of CarrierX, WC Docket No. 20-419 (filed Feb. 22, 2021) (“CarrierX Comments”).

² Application of Zoom Voice Communications, Inc. for Numbering Authorization, WC Docket No. 20-419 (filed Dec. 9, 2020).

³ *Interconnected VoIP Numbering Authorization Application Filed by Zoom Voice Communications, Inc. Pursuant to Section 52.15(g)(3) of the Commission’s Rules*, Public Notice, WC Docket No. 20-419, at 2 (rel. Feb. 5, 2021).

concerns. Instead, CarrierX argued that because the Bureau recently removed a “substantially similar application” from streamlined processing, it should do the same for Zoom’s application out of fairness.

Zoom’s application is readily distinguishable from the applications that the Commission removed from streamlined processing. CarrierX’s comments referred to applications filed by five entities collectively known as the “HDC Companies.”⁴ After the HDC Companies filed applications for numbering authority, AT&T filed comments in opposition identifying issues specific to the applications that raised public interest concerns.⁵ AT&T noted that the applicants appeared to be related to an individual and entities linked to “access arbitrage schemes.”⁶ AT&T further observed that a formal complaint was pending at the Commission against a local exchange carrier owned by that same individual. The complaint was even specifically related to the carrier’s use of VoIP services from a related company: it alleged that the carrier “is using a closely associated provider of VoIP services in an attempt to evade its intercarrier compensation obligations,” leading to “call blocking and congestion.”⁷ AT&T therefore asked the Commission to remove the application from streamlined processing due to the applicants’ “apparent connection to entities linked to access arbitrage activities,” and it asked to review sealed materials to determine whether the applicants intended to access the PSTN via the carrier that

⁴ See Applications of HDC Alpha, LLC; HDC Beta, LLC; HDC Delta, LLC; HDC Epsilon, LLC; and HDC Gamma, LLC, for Authorization to Obtain Numbering Resources, WC Docket Nos. 19-313, 19-314, 19-315, 19-316 & 19-317 (filed Oct. 8, 2019).

⁵ Comments of AT&T in Opposition to Interconnected VoIP Numbering Authorization Applications Filed by HDC Alpha, LLC et al., WC Docket Nos. 19-313, 19-314, 19-315, 19-316 & 19-317 (filed Jan. 21, 2021).

⁶ *Id.* at 2.

⁷ *Id.*

was the subject of the formal complaint.⁸ Unlike CarrierX, AT&T’s comments raised specific, particularized public interest concerns with the applications before the Commission.

CarrierX, on the other hand, does not argue that Zoom receiving numbering authority would raise distinct public interest concerns. Instead, it argues that the Commission should impose further scrutiny on Zoom’s application to evaluate “whether the request for additional numbering resources will promote access arbitrage practices or create incentives for inefficient number utilization,” without offering any basis to think that those issues are relevant to Zoom.⁹

The Commission has already examined the generalized concerns raised by CarrierX and addressed them through notice and comment rulemaking. In its *Order* adopting numbering access requirements, the Commission noted concerns raised by commenters, including that direct access “could have negative consequences for routing and intercarrier compensation,” and concluded both that the benefits of direct access “outweigh any perceived risks” and that the conditions adopted by the Commission would “mitigate any risks.”¹⁰ CarrierX’s objection to Zoom’s application is in an improper, time-barred collateral attack on this conclusion and the Commission’s prior rulemaking, not a party-specific objection to Zoom’s request for numbering authority.

The Commission has made it clear that objections like CarrierX’s are improper. In the transaction context, for example, the Commission weighs “transaction-specific” benefits—those that arise as a result of the transaction and could not be accomplished in the absence of the

⁸ *Id.* at 2-3.

⁹ CarrierX Comments at 3.

¹⁰ *Numbering Policies for Modern Communications*, Report & Order, 30 FCC Rcd. 6839, ¶ 15 (2015).

transaction—and it imposes conditions only to ameliorate the “transaction-specific” harms.¹¹

The Commission does not address issues raised by parties who comment on the proceeding to raise concerns that are irrelevant or unrelated to the specific transaction under review.¹² This established, well-founded rule applies with just as much force in this context.¹³

CarrierX’s comments provide no reason to remove Zoom’s application from streamlined processing. They do not allege that Zoom has violated any Commission rule, identify any deficiencies in Zoom’s application, or identify any public interest concerns related to Zoom that require further review. The Commission should process the application on a streamlined basis and ultimately deem the application granted.

Respectfully submitted,

Kari Zeni
Associate General Counsel
ZOOM VOICE COMMUNICATIONS, INC.

/s/ Brita D. Strandberg
Brita D. Strandberg
Daniel P. Tingley
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street, NW, 8th Floor
Washington, DC 20036
(202) 730-1300

Counsel to Zoom Voice Communications, Inc.

¹¹ See, e.g., *Applications of T-Mobile US, Inc., & Sprint Corp., for Consent to Transfer Control of Licenses & Authorizations*, 34 FCC Rcd. 10,578, ¶¶ 40, 214 (2019).

¹² See, e.g., *Applications of Softbank Corp., Starburst II, Inc., Sprint Nextel Corp., & Clearwire Corp.*, 28 FCC Rcd. 9642, ¶¶ 80-81 (2013) (rejecting calls to address industry-wide issues in a party-specific transaction).

¹³ The Commission’s greenmail rules are another example of the Commission’s disapproval of insincere, irrelevant attempts by interested parties to derail legitimate applications filed with the Commission. See, e.g., *Amendment of Part 90 of the Commission's Rules to Permit the Short-Spacing of Specialized Mobile Radio Sys. Upon Concurrence from Co-Channel Licensees*, 7 FCC Rcd. 6069, ¶ 9 (1992).