



September 8, 2025

VIA ECFS AND EMAIL

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Confidential Treatment, Application of X-Nets Inc. for Authority to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules

Dear Ms. Dortch:

Pursuant to section 52.15(g) of the Commission's rules, X-Nets Inc. ("X-Nets") hereby submits the enclosed application for authorization to obtain numbering resources and requests confidential treatment of Exhibits A-2, A-3, and B contained therein. Consistent with sections 0.457 and 0.459 of the Commission's rules,¹ X-Nets has labeled the relevant exhibits "Confidential – Not for Public Inspection."

X-Nets respectfully requests confidential treatment for Exhibits A-2 and A-3, which contain evidence of X-Nets' compliance with its 911 obligations under part 9 of the Commission's rules, as well as with the provisions of the Communications Assistance with Law Enforcement Act, 47 U.S.C. § 1001 *et seq* ("CALEA"). These Exhibits contain commercially sensitive agreements between X-Nets and its 911 service provider, as well as technologically sensitive diagrams showing how X-Nets complies with CALEA.

Additionally, X-Nets respectfully requests confidential treatment for Exhibit B, which contains the interconnect agreement between X-Nets and its Competitive Local Exchange Carrier ("CLEC") partner. This Exhibit contains commercially sensitive pricing information and proprietary technical information that X-Nets does not make publicly available in the normal course of business. X-Nets therefore requests that the information in Exhibits A-2, A-3, and B be withheld from public inspection pursuant to Exemption 4 of the Freedom of Information Act ("FOIA") and section 0.457 of the Commission's rules.²

1. Identification of the specific information for which confidential treatment is sought.

X-Nets requests that Exhibits A-2, A-3, and B be withheld from public disclosure

¹ See 47 CFR §§ 0.457, 0.459.

² See 5 U.S.C. § 552(b)(4); see also 47 CFR § 0.457(d)(2)

under 5 U.S.C. § 552(b)(4) and 47 CFR § 0.457(d)(2). These Exhibits contain proprietary and commercially sensitive information concerning X-Nets' commercial agreement with its 911 service provider, technical diagrams showing how X-Nets complies with CALEA, and the pricing and terms of the agreement between X-Nets and its telecommunications partner to serve as X-Nets' homing tandem and to route local and access traffic (both originating and terminating) to the public switched telephone network ("PSTN").

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

X-Nets is submitting Exhibits A-2, A-3, and B with its application for numbering resources as proof that it complies with its 911 obligations under part 9 of the Commission's rules, as well as with the provisions of CALEA, pursuant to section 52.15(g)(3)(ii)(E) of the Commission's rules, and as proof that it is capable of providing service within sixty days of the numbering resources activation date, pursuant to section 52.15(g)(3)(ii)(H) of the Commission's rules.

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

Exhibits A-2 and A-3 contain business confidential agreements between X-Nets and its 911 service provider, and technical diagrams showing how X-Nets transmits voice traffic to the PSTN in compliance with CALEA. Exhibit B contains the interconnect agreement between X-Nets and its CLEC partner with confidential pricing and technical terms. This information is subject to exemption from public disclosure under FOIA Exemption 4.³ The Commission has long held that, for the purposes of Exemption 4, "records are 'commercial' as long as the submitter has a commercial interest in them."⁴

4. Justification of the period during which the submitting party asserts that material should not be available for public disclosure

The confidential information contained in Exhibits A-2, A-3, and B should never be released for public inspection. The information is commercially sensitive and

³ See 5 U.S.C. § 552(b)(4).

⁴ Pub. Citizen Rsch. Grp. v. FDA, 704 F.2d 1280, 1291 (D.C. Cir. 1983) (quoting Gulf & W. Indus. v. United States, 615 F.2d 527, 530 (D.C. Cir. 1979)).

confidential and any release would commercially disadvantage X-Nets.

For the foregoing reasons, X-Nets respectfully requests that the Commission keep Exhibits A-2, A-3, and B within the enclosed supplement confidential and withhold them from public inspection.

Please direct any questions regarding this request to the undersigned.

Respectfully submitted,

/s/

Majdi Abdulqader
Chief Technical Officer
X-Nets Inc.

Enc.

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

_____)
In the Matter of)
X-Nets Inc.)
For Authority to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's rules)
_____)
WC Docket No. _____	

**APPLICATION OF X-NETS INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

X-Nets Inc. ("X-Nets"), a provider of interconnected Voice over Internet Protocol ("VoIP") service, hereby respectfully requests authorization from the Federal Communications Commission ("FCC" or "Commission") for numbering resources pursuant to Commission Rule Section 52.15(g)(3)(ii). The Company is headquartered in San Jose, CA, and does not have a parent corporation. NECA has assigned the Company an Operating Company Number ("OCN")- 741L.

Under the Commission's Numbering Order, 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. The number resources that are the subject of this Application will be used to provide interconnected VoIP services initially in the state of California, although X-Nets ultimately intends to provide such service in all states.

X-Nets has negotiated a traffic roaming agreement with BICS and it will serve as X-Nets' access homing tandem and to route local and access traffic (both originating and terminating) to the PSTN. BICS interconnects with its

telecommunications provider partners that will broadcast their tandem platforms for the purposes of managing X-Nets' assigned OCN. To further support this application, X-Nets provides the following additional information:

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

A. § 52.15(g)(3)(ii)(A)

Name: X-Nets Inc.
Address: 1625 The Alameda, Suite 700
City: San Jose
State: CA
ZIP Code: 95126
Country: USA
Telephone: (925) 383-0904
Website: x-nets.com

Contact for regulatory requirements and compliance with the Commission's rules:

Name: Majdi Abdulqader
Title: Chief Technical Officer
Address: 1625 The Alameda, Suite 700
City: San Jose
State: CA
ZIP Code: 95126
Country: USA
Telephone: (925) 383-0904
Email: majdi.abdulqader@x-nets.com

Contact for 911 and Law Enforcement:

Name: Majdi Abdulqader
Title: Chief Technical Officer
Address: 1625 The Alameda, Suite 700
City: San Jose
State: CA
ZIP Code: 95126
Country: USA
Telephone: (925) 383-0904
Email: majdi.abdulqader@x-nets.com

B. § 52.15(g)(3)(ii)(B)

X-Nets 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, to the numbering authority delegated to the states, and the state laws, regulations, and registration requirements applicable to businesses operating in each state where X-Nets seeks numbering resources. The Company hereby 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)(ii)(C)

X-Nets hereby certifies that it will not use the numbers obtained pursuant to an authorization under Section 52.15(g) to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under 47 CFR §§ 64.1200, 64.1604, and 64.6300 *et seq.*, and 16 CFR 310.3(b).

D. § 52.15(g)(3)(ii)(D)

X-Nets hereby certifies that it 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 47 CFR §§ 64.6301 to 64.6305.

E. § 52.15(g)(3)(ii)(E)

X-Nets hereby certifies that it complies with its 911 obligations under part 9 of the Commission's rules, as well as with the provisions of the Communications Assistance with Law Enforcement Act, 47 U.S.C. § 1001 *et seq.* Evidence that X-Nets has complied with these requirements is attached hereto as *Exhibit A*. The Company requests confidential treatment under the Commission's rules for parts of *Exhibit A*.

F. § 52.15(g)(3)(ii)(F)

X-Nets hereby certifies that it complies with the Access Stimulation rules under 47 CFR § 51.914.

G. § 52.15(g)(3)(ii)(G)

X-Nets 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.

H. § 52.15(g)(3)(ii)(H)

X-Nets hereby sets forth its capability to provide service within sixty (60) days of the numbering resources activation date. A roaming agreement demonstrating the access to the platform and capability of BICS' network is attached to this application as *Exhibit B*. The Company requests confidential treatment under the Commission's rules for *Exhibit B*. Also attached, as *Exhibit C*, is a network diagram showing the call flow for the origination and termination of X-Nets' customers' calling traffic.

I. § 52.15(g)(3)(ii)(I)

X-Nets has not yet begun providing service. Its roaming agreement was effective September 1 with BICS. As such, X-Nets has not yet filed a Broadband Data Collection report nor obtained a USF filer ID from USAC.

J. § 52.15(g)(3)(ii)(J)

X-Nets 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. X-Nets' FRN is 0036854842 and will provide its 499 Filer ID after customer service activation begins in the following weeks.

K. § 52.15(g)(3)(ii)(K)

X-Nets 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. The Company's key management and technical personnel are below.

Key Personnel:

Majdi Abdulqader PhD – Chief Technical Officer

Sam Nassar – Chief Operating Officer

Minchul Ho – Chief Revenue Officer

Ghada Samir CPA/MBA - Chief Financial Officer

Attached as *Exhibit D* is a description of the experience for each individual. 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 applicable to unlawful robocalls or unlawful spoofing.

L. § 52.15(g)(3)(ii)(L)

Attached hereto as *Exhibit E* is a list containing the name, address, citizenship, and principal businesses of all individuals and entities that directly or indirectly own at least ten percent of the equity of X-Nets, and the percentage of equity owned by each of those entities (to the nearest one percent). X-Nets does not have any interlocking directorates with any foreign carrier. X-Nets hereby certifies that it is not affiliated with a foreign carrier.

M. § 52.15(g)(3)(i)(M)

X-Nets 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.

N. § 52.15(g)(3)(ii)(N)

A declaration prepared pursuant to Section 1.16 of the Commission's rules is attached hereto as *Exhibit F*.

II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(x)

As required by Section 52.15(g)(3)(x), X-Nets will maintain the accuracy of all contact information, certifications, and ownership or affiliation information in this application, and will file a correction with the Commission and each applicable state within thirty (30) days of any changes.

III. CONCLUSION

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

Respectfully submitted,

/s/

Majdi Abdulqader
Chief Technical Officer
X-Nets Inc.

September 8, 2025

Attachments

Exhibit A

Exhibit A-1: 911 Reliability Certification for 2023

Exhibit A-2: Master Services Agreement and 911-Terms and Conditions with 911 Service
Provider (Submitted Pursuant to Confidentiality Request)

Exhibit A-3: CALEA Compliance (Submitted Pursuant to Confidentiality Request)

Exhibit A-1
911 Reliability Certification

Attestation by Certifying Official

911 Reliability Certification for 2025

Pursuant to Federal Communications Commission Rule 12.4, 47 C.F.R. § 12.4, I hereby attest that I am a corporate officer with supervisory and budgetary authority over network operations of a Covered 911 Service Provider in all relevant service areas.

I further attest, under penalty and perjury, that covered 911 Service Provider X-Nets Inc.:

1. Has satisfied applicable certification obligations with respect to circuit diversity, backup power and network monitoring set forth in Federal Communications Commission Rule 12.4(c), 47 C.F.R. § 12.4 (c).
2. Has adequate internal controls to bring to my attention material information regarding network architecture, operations, and maintenance that would affect the certification.
3. Has made me aware of all material information reasonably necessary to complete the certification.

_____/s/_____
Majdi Abdulqader
Chief Technical Officer, X-Nets Inc.

Exhibit A-2: Master Services Agreement and 911-Terms and Conditions with 911
Service Provider (Submitted Pursuant to Confidentiality Request)

REDACTED FOR PUBLIC INSPECTION

Exhibit A-3: CALEA Compliance (Submitted Pursuant to Confidentiality Request)

REDACTED FOR PUBLIC INSPECTION

Exhibit B

Contract for Call Origination and Termination Showing Capability to Provide
VoIP Services

REDACTED FOR PUBLIC INSPECTION

Exhibit C
Call Flow Network Diagram

REDACTED FOR PUBLIC INSPECTION

Exhibit D
Management

Majdi Abdulqader PhD

X-Nets Chief Technical Officer

With dual PhDs in **Telecommunications** and **Applied Mathematics** from **Harvard University** and **Dundee University**, and a distinguished career spanning more than two decades, **Majdi** is a recognized leader in advanced communications and computing technologies. Over 20 years at **AT&T Labs** and **Intel Inc.**, he successfully drove the development and launch of **hundreds of innovative products**, combining deep academic expertise with practical industry impact.

An accomplished researcher with numerous **peer-reviewed publications**, Majdi has consistently bridged the gap between cutting-edge theory and real-world implementation. His work has influenced **network architectures, data systems, and AI-driven platforms**, delivering both technical innovation and measurable business value.

- First 5G Modem Design, and prototype.
- Different Security and Encryption protocols for Communication channels.
- Enhanced 911 beyond Terrestrial,
- Locating and Tracking in Modern Networks.
- Multitenant Networking.
- Telco AI, the next phase of Smart Networking
- Embedding Satellite Communication with Terrestrial applications

<https://www.linkedin.com/in/majdi-abdulqader-ph-d-048517267/>

Sam Nassar

X-Nets Chief Operation Officer

IT Executive | Information Technology Management | Digital Transformation | Data Insights | AI & ML | Solutions | Technical Account Management | Customer Support | Customer Success

Experienced Transformational leader aligning technical strategy with operations that drive revenue, maximize efficiencies, and reduce costs. Background includes proven track record managing teams across industries including Data Carriers, and IP Services, Semiconductor/Manufacturing, Retail, and Call Centers.

Led large scale digital transformation programs, customer value creation through robust product offerings, go-to-market, and monetization, innovated by leveraging data and technology with a strong focus on P&L.

<https://www.linkedin.com/in/samernassar/>

Minchul Ho

X-Nets Chief Revenue Officer

Minchul is a results-oriented leader with a proven track record of driving revenue growth and delivering business success across competitive markets. With deep expertise in strategy, execution, and customer engagement, he consistently identifies new market opportunities, expands customer adoption, and translates innovation into measurable financial results.

Minchul key strengths include:

- **Revenue Acceleration:** Skilled at building and scaling go-to-market strategies, creating sustainable revenue streams, and unlocking new business channels.
- **Customer Success:** Focused on delivering value-driven solutions that strengthen client relationships, improve retention, and expand long-term partnerships.
- **Strategic Leadership:** Aligns cross-functional teams around clear business goals, enabling both operational efficiency and accelerated growth.
- **Innovation in Practice:** Combines vision with execution to turn emerging technologies into real-world, profitable solutions.

Through these capabilities, Minchul has repeatedly proven the ability to transform business strategy into profitable outcomes, while inspiring teams and partners to achieve lasting success.

<https://www.linkedin.com/in/minchul-ho-276984/>

Ghada Samir CPA/MBA

X-Nets Chief Finance Officer

Ghada is a highly accomplished Chief Financial Officer (CFO), holding both a CPA and an MBA, with a proven track record of driving financial success across multiple industries. With her deep expertise in financial strategy, corporate governance, and operational efficiency, she has guided companies through periods of rapid growth, transformation, and market expansion.

Throughout her career, Ghada has successfully optimized capital structures, streamlined operations, and maximized shareholder value, enabling organizations to achieve sustained

profitability and long-term financial stability. Her leadership is marked by strategic foresight, disciplined execution, and strong stakeholder engagement, making her a trusted advisor to executive teams and boards alike.

Exhibit E

Equity Holders

This statement certifies that all authorized shares of **X-Nets Inc.**, a corporation organized and existing under the laws of the State of Wyoming, remain fully owned by the Corporation and have not been distributed, assigned, or transferred to any individual or entity.

As of the date of this statement:

- **Company Name:** X-Nets Inc.
- **State of Incorporation:** Wyoming
- **Date of Incorporation:** [03/24/2025]
- **Authorized Shares:** [10,000]
- **Issued Shares:** None (all authorized shares remain unissued and are the property of the Corporation)

The Corporation affirms that the equity has not been distributed to any shareholder and remains under the ownership of the Company as a corporate entity.

The officers of the Corporation are as follows:

- **President:** Majdi Abdulqader
- **Treasurer:** Ghada Samir

This statement is issued to confirm the ownership status of the Company's equity as of [09/07/2025].

Authorized By:

[Majdi Abdulqader]
President
[X-Nets, Inc.]
[09/07/2025]

[Ghada Samir]
Treasurer
[X-Nets, Inc.]
[09/07/2025]

Exhibit F

Section 1.16 Officer Declaration

DECLARATION OF MAJDI ABDULQADER

I, Majdi Abdulqader, hereby declare under the penalty of perjury, pursuant to 47 C.F.R. § 1.16, that the following is true and correct:

1. I am the Chief Technical Officer for X-Nets Inc. (“X-Nets”). I have served in this role since March 26, 2025.

2. I have reviewed the foregoing Application of X-Nets for Authorization to Obtain Numbering Resources, and the exhibits thereto, and I am familiar with their contents.

3. To the best of my knowledge, information, and belief, the information outlined in the foregoing Supplement is true and accurate.

_____/s/_____

Majdi Abdulqader
Chief Technical Officer

September 8, 2025