

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

In the Matter of)	
)	
Megaphone, Inc., Applicant)	
)	WC Docket No. 17-62
For Authorization to Obtain Numbering)	
Resources Pursuant to Section 52.15(g))	
of the Commission's Rules)	

**AMENDED APPLICATION OF MEGAPHONE, INC. FOR
AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Megaphone, Inc. (“Megaphone”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully submits this Amended Application requesting authorization to obtain numbering resources. This Amended Application is provided to provide clarifications recently requested by Commission staff.

Under the Commission’s *Numbering Order*,¹ 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. Megaphone hereby requests the Commission grant it that authorization. In support of this application, Megaphone has obtained an FRN, and states that its Company Code (OCN) is 007J and ACNA is GPZ. Megaphone has obtained a 499A number and will begin reporting revenues in the next applicable quarter. Megaphone has adopted CPNI standards and is in the process of filing those standards and a CPNI report even though it did not have customers in 2016, and is doing so to ensure compliance and to have its policies on file with the FCC. Megaphone is a Delaware

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

corporation, is qualified to do business in and is operating in Massachusetts, and is in good standing. Megaphone has connected and tested its circuits and interconnection, and has begun providing services to customers. Megaphone is exclusively an interconnected VoIP service provider as defined by Section 9.3 of the Commission's Rules, 47 C.F.R. § 9.3. Megaphone will exclusively use numbers to provide voice over Internet protocol services. Applicant also provides the following information:

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

(A) § 52.15(g)(3)(i)(A)

Name: Megaphone, Inc.

Address: 16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778

Telephone: 617-225-5190

Qualified Personnel: David Silver, President/CEO
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3308
DavidSilver@megaphone.com

Scott Yacino, Vice-President/CTO
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3304
scotty@megaphone.com

Yan Wang, Vice-President/COO
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3301
yanw@megaphone.com

(B) § 52.15(g)(3)(i)(B)

Megaphone 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. Megaphone 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)

Megaphone 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. Megaphone states that it initially intends to request numbers in Massachusetts, but that it may eventually seek numbers in all fifty states.

(D) § 52.15(g)(3)(i)(D)

Megaphone is fully capable of providing service within 60 days of the numbering resources activation date. Megaphone has an OCN and ACNA in the IPES category, has an interconnection agreement in place for routing traffic to ILECs, and has, installed and operates direct IP interconnections. In addition, Megaphone has developed porting processes to enable carriers to submit porting requests and its personnel has accomplished ports with no difficulty. Scott Yacino has extensive experience in managing numbers in SMS and in number routing. Megaphone currently provides services to customers. Megaphone 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, Megaphone will be able to place nearly all numbers into service within 60 days of activation.

As proof of its facilities readiness, Megaphone has attached to this application (1) an interconnection agreement between Megaphone and a carrier partner providing that the carrier partner will host Megaphone numbers on its switches and provide PSTN connectivity for both inbound and outbound calls to Megaphone numbers, and (2)

demonstration that Megaphone's carrier partner maintains Feature Group D connections with an ILEC and is fully interconnected to the PSTN. These documents are contained in Exhibits A and B to this application. Megaphone has requested confidential treatment under the Commission's rules for both Exhibits and has filed them separately.

(E) § 52.15(g)(3)(i)(E)

Megaphone 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)

Megaphone 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. Senior Megaphone personnel each have over thirty two (32) years of experience in the telecommunications industry and have already installed and operate SIP/VoIP equipment that is interconnected with traditional TDMA equipment.

Megaphone has the financial stability required to ensure the reliable provisioning of its communications services, including numbering, throughout its service area. Megaphone personnel have successfully operated various communications businesses since as early as 1986, and have operated the current facilities used by Megaphone for over ten years. It has

already built out its network through internally generated revenues and will continue to be able to fund future development through its operations and investment by its founders. Megaphone carries no debt, and does not need to rely on debt as it is internally financed.

Megaphone is in good regulatory standing with the FCC.

Megaphone has the superior technical and managerial qualifications necessary to provide and maintain successful operations within its service area. The company has obtained interconnected telecommunications switching facilities in the Boston area, and is building a mirrored site that will be fully connected via fiber loops that it has obtained. It is fully interconnected to other carriers in a Level 3 facility and has access to two shared cages at that facility. Its facilities are fully interconnected via multiple fiber arrangements. These interconnections, combined with its own private network, provide Megaphone with the capability to ensure the continued provisioning of quality services to customers.

Megaphone'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 network, telephony, and software engineers that is highly qualified to manage the operations of Megaphone throughout its service area. Megaphone'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 Silver, President/CEO
 16 Boston Post Road, PMB 162
 Wayland, Massachusetts 01778
 Telephone: 617-374-3308
 DavidSilver@megaphone.com

Scott Yacino, Vice-President/CTO
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3304
scotty@megaphone.com

Yan Wang, Vice-President/COO
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3301
yanw@megaphone.com

Will Colbert, Senior Software Engineer
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3315
(email address omitted)

Scott Schultz, Senior Software Engineer
16 Boston Post Road, PMB 162
Wayland, Massachusetts 01778
Telephone: 617-374-3309
(email address omitted)

(G) § 52.15(g)(3)(i)(G)

Megaphone 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), Megaphone 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. Megaphone 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, Megaphone respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

A handwritten signature in dark blue ink, appearing to read "Walter E. Steimel, Jr."

Walter E. Steimel, Jr.
The Steimel Law Group
1455 Pennsylvania Avenue NW, Suite 770
Washington DC 20006
202-271-9258

March 13, 2017

EXHIBIT A

INTERCONNECTION AGREEMENT

(previously submitted pursuant to Confidentiality Request under 47 C.F.R. §§ 0.457 and 0.459)

EXHIBIT B

CARRIER PARTNER STATEMENT

(previously submitted pursuant to Confidentiality Request under 47 C.F.R. §§ 0.457 and 0.459)

EXHIBIT C

STATEMENT OF NUMBER REQUESTS

Megaphone initially intends to request numbers in Massachusetts.

As it expands, Megaphone may request numbers in all fifty states, but has no definitive plans at this time.

Megaphone will file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators.