

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

In the Matter of)
)
Inter Vista Networking, Inc., Applicant) WC Docket No. 17-44
)
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
the Commission's Rules)

**AMENDED SUPPLEMENT TO APPLICATION OF INTER VISTA NETWORKING,
INC. FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Michel Singer Nelson, Esq.
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Policy
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May 8, 2017

Inter Vista Networking, Inc. ("Inter Vista") pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, respectfully amends its March 28, 2017 supplement ("Supplement") to its February 2, 2017 Application for Authorization to Obtain Numbering Resources ("Application") as described below.

As set forth in 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. Inter Vista filed its Application on February 2, 2017 and on March 28, 2017 filed a Supplement to its Application to respond to questions from the Commission Staff. Inter Vista hereby amends the Supplement to address additional questions from Commission Staff.

1. Contact information for Michel Singer Nelson. Ms. Singer Nelson, Counsel and VP of Regulatory and Public Policy may be reached directly by dialing 916 235 2028 or through email at mnelson@o1.com.

2. Interconnected VoIP Services and Form 477 filing. Inter Vista intends to provide interconnected Voice over Internet Protocol ("VoIP") services as defined by 47 C.F.R. §9.3 as well as non-interconnected VoIP services. This Application relates only to Inter Vista's provision of interconnected VoIP services. Inter Vista understands its obligations to file the Commission's Form 477 when due and intends to do so consistent with the Commission's rules.

3. List of States for Initial Numbering Requests. Inter Vista intends initially to

¹ *Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd 6839 (2015).

request numbers to enable it to operate in the State of California. Upon deciding to request numbers and expand operation to additional states, Inter Vista will follow the Commission's rules to do so.

4. Clarification regarding the parties to Confidential Exhibit A and Exhibit B.

Inter Vista intends to provide services initially through partnering with its affiliates, including its regulated affiliate O1 Communications, Inc.. Confidential Exhibit A attached to Inter Vista's Application is a confidential commercial agreement between Inter Vista and one of its affiliates, O1 Services, Inc. ("Agreement"). O1 Services, Inc. is a non-regulated entity that enters into commercial agreements to provide services to customers through O1 Services, Inc.'s regulated affiliates as necessary, including O1 Communications, Inc., a certified competitive local exchange carrier ("CLEC") and inter-exchange carrier ("IXC"). The parties intend O1 Communications, Inc. to act as Inter Vista's CLEC partner as necessary to enable Inter Vista's customer traffic to be exchanged with the public switched telephone network ("PSTN"). Attached to this Amended Supplement is Exhibit C, which is an addendum to the Agreement which names O1 Communications, Inc. as the party to the Agreement to provide services directly to Inter Vista as its CLEC partner.

Exhibit B to the Application is the interconnection agreement ("ICA") between Inter Vista's CLEC partner, O1 Communications, Inc. and Pacific Bell Telephone Company d/b/a SBC Pacific Bell Telephone Company for the State of California (now d/b/a AT&T California). The excerpts of the ICA filed in Exhibit B name Pac-West Telecomm, Inc. as the CLEC party to the agreement instead of O1 Communications, Inc. To eliminate confusion that may result from the naming of Pac West in Exhibit B instead of O1 Communications, Inter Vista provides the following explanation. O1 Communications, Inc. opted into the Pacific Bell/Pac-West

agreement pursuant to Sections 251 and 252 of the federal Communications Act, 47 U.S.C. §151 *et seq.* . O1's adoption of Pac West's agreement is practically executed by the parties through the replacement of Pac West's name by O1 Communication's name throughout the agreement.

Excerpts of the ICA filed as Exhibit B to the Application were retrieved from AT&T's website (https://clec.att.com/clec_cms/clec/clec.html#P) and identified by AT&T as the ICA between O1 Communications, Inc. and AT&T currently in effect for the State of California.

5. No International Ownership. No international entities possess any ownership of Inter Vista.

Dated this 8th day of May 2017.

Respectfully Submitted,



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