

December 23, 2024

VIA ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW

**Re: Supplement Number 1 to AM Communication Labs, Inc. Application for
Direct Access to Numbering Resources, with Confidentiality Request for Exhibit D**

Dear Ms. Dortch:

Following discussion with Commission Staff, AM Communication Labs, Inc. (“AM Comm”) hereby supplements its October 30, 2024 Application for Authorization to Obtain Numbering Resources in the following three respects:

First, Section (K) § 52.15(g)(3)(ii)(K) is amended to replace the final sentence in that section with this sentence:

AM Comm further warrants that neither the applicant nor any of the identified personnel are being or have been investigated by the Commission, law enforcement, or any regulatory agency for failure to comply with any law, rule, or order, including the Commission's rules in this chapter applicable to unlawful robocalls or unlawful spoofing.

Second, the Certification in Section (L) § 52.15(g)(3)(ii)(L) is amended to state as follows:

AM Comm certifies that it is not itself, and is not affiliated with, a foreign carrier, and that there are no interlocking directorates with a foreign carrier.

Third, Confidential Exhibit D is amended to include a diagram of the applicant's vertical ownership structure. That information is confidential for the same reasons that the original Exhibit D is confidential, as explained in my October 30, 2024 letter seeking confidential treatment for, inter alia, that Exhibit under Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457 and 0.459, and we therefore seek confidential treatment for the supplemental Exhibit D for the reasons given therein.

Mr. Jantz's supporting Verification of this supplemental material is enclosed.

RICHMOND

1519 Summit Avenue, Suite 102, Richmond, VA 23230
P: 804-441-8440 F: 804-441-8438

TYSONS CORNER

8200 Greensboro Drive, Suite 820, McLean, VA 22102
P: 703-485-3535 F: 703-485-3525

Please contact me with any questions or concerns regarding this matter.

Sincerely,



Joseph P. Bowser
1519 Summit Ave, Suite 102
Richmond, Virginia 23230
T: (804) 441-8701
F: (804) 441-8438
jbowser@rothjackson.com
Counsel to AM Communication Labs Inc.



RICHMOND

1519 Summit Avenue, Suite 102, Richmond, VA 23230
P: 804-441-8440 F: 804-441-8438

TYSONS CORNER

8200 Greensboro Drive, Suite 820, McLean, VA 22102
P: 703-485-3535 F: 703-485-3525

VERIFICATION

I, Jason Jantz, CEO of AM Communication Labs Inc. ("AM Comm"), and a resident of Vancouver, British Columbia, Canada, declare under penalty of perjury, that the information in AM Comm's Direct Access to Numbering Resources Application, and the information in and enclosed with our counsel's supplemental letter, is true and correct to the best of my knowledge and the company's records.

Date: 12 / 21 / 2024

By: 

Jason Jantz, CEO
AM Communication Labs Inc.

CONFIDENTIAL EXHIBIT D

CONFIDENTIAL – REDACTED IN ITS ENTIRETY