

FCC VoIP Numbering Authorization Application – Supplemental Filing

Applicant Information:

- **Company Name:** ConnectTo Communications, Inc.
- **Website:** <http://www.ConnectTo.com>
- **Address:** 555 Riverdale, Suite A, Glendale, CA 91204
- **Primary Contact:** Aram Ter-Martirosyan
- **Email:** aram@ConnectTo.com
- **Phone:** 818.546.4601
- **Fax:** 818.546.4617

Response to Missing Information in Initial Application:

Form 477 / Broadband Data Collection Filing (52.15(g)(3)(ii)(I)) ConnectTo Communications is currently in the process of making its BDC submission. Proof of filing will be submitted as a supplement to this application. If ConnectTo determines that a BDC filing is not required, we will submit a written explanation accordingly.

State List – Intended State of Initial Service ConnectTo Communications currently operates in California. Upon receipt of VoIP numbering authorization, ConnectTo intends to

begin offering services in California and expand to neighboring states before scaling nationwide to all 50 states and U.S. territories.

Certifications (per 47 CFR § 52.15(g)(3)(ii)):

(iii)(B) – "The applicant certifies that it will comply with the requirements of this section and other applicable Commission rules and orders, including compliance with number utilization and optimization requirements, local number portability, and contribution to the Federal cost recovery mechanisms."

(iii)(C) – "The applicant certifies that it is in compliance with the applicable service provider obligations under part 64, subpart BBB of this chapter (relating to the prevention of illegal robocalls)."

(iii)(J) – "The applicant certifies that it is not subject to denial of Federal benefits pursuant to the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862."

(iii)(K) – "The applicant certifies that it possesses the requisite technical qualifications to provide the proposed service and has identified technical personnel responsible for compliance with the Commission's rules. Contact: Aram Ter-Martirosyan, CIO, aram@connectto.com"

(iii)(L) – "The applicant certifies that it is in compliance with the requirements of § 68.18(h) and (i):

- 68.18(h)(1): Applicant is not subject to revocation, suspension, or cease operations order.
- 68.18(h)(2): Applicant is not subject to any unresolved enforcement action.
- 68.18(h)(3): Applicant has not been denied numbering resources for misrepresentation.
- 68.18(i): Applicant is not using numbering resources in violation of FCC rules."

(iii)(M) – "The applicant certifies that it will file any required regulatory fees with the Commission, including annual and/or quarterly filings as appropriate."

Facilities Readiness Proof (52.15(g)(3)(ii)(H)) ConnectTo Communications has existing interconnection agreements with AT&T and Verizon, as well as other ILECs in California. These agreements are already submitted as exhibits in redacted or public form to

demonstrate facilities readiness and the ability to originate and terminate traffic to/from the PSTN.

Proof of 911 / CALEA Compliance ConnectTo is a CLEC operating in California and has active agreements in place with carrier partners providing E911 routing and PSAP callback capabilities. Supporting documentation and agreements are already submitted as exhibits to original filing.

Business Purpose Clarification ConnectTo is a CLEC only within the state of California, specifically operating in LATA 730. Our interconnection agreement is state-mandated, executed in California in 2006, and is still active and valid. There have been no amendments or replacements since the ICA continues to meet the necessary regulatory and operational requirements.

ConnectTo is seeking Direct Access authorization to expand our VoIP service operations beyond the boundaries of LATA 730. We currently obtain numbering blocks through NANPA, but only for use within LATA 730. With Direct Access, we aim to acquire Direct Inward Dialing (DID) across all other U.S. states and territories. This expansion supports our nationwide cloud-based VoIP service strategy designed for residential and business customers. While ConnectTo is a CLEC, it intends to obtain numbers under Direct Access as an VoIP provider to support nationwide expansion of its cloud-based VoIP services offered over broadband. These services are designed for residential and small business users, utilizing IP-based infrastructure and softswitch platforms.

Technical Personnel Contact Information

The following technical personnel is designated for compliance and regulatory communications regarding numbering authorization:

- **Name:** Aram Ter-Martirosyan
- **Title:** Chief Information Officer
- **Company:** ConnectTo Communications, Inc.

- **Email:** aram@connectto.com
- **Phone:** 818.546.4601

Declaration for Supplemental Filing I, Aram Ter-Martirosyan, hereby declare under penalty of perjury that the foregoing supplemental filing and all attached exhibits are true and accurate to the best of my knowledge.

Signature: _____



Printed Name: Aram Ter-Martirosyan

Title: Chief Information Officer

Date: ___3/28/2025_____

List of Supplemental Exhibits (submitted to original filing):

1. Interconnection Agreements (updated ICA, ideally post-2006) - **Is up to date and active**
2. Commercial service agreements demonstrating routing capabilities - **Is part of ICA and is with AT&T, Version and Frontier**
3. BDC filing confirmation or explanatory statement
4. 911 service provider agreement and CALEA compliance documentation
5. Declaration of Supplemental Filing