

July 26, 2023

VIA ECFS

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

**Re: PAETEC iTEL, L.L.C.'s Restated Application for Interconnected VoIP
Numbering Authorization
WC Docket No. 20-416**

Dear Ms. Dortch:

On behalf of PAETEC iTEL, L.L.C. ("Windstream IPES"), we provide this supplemental information relevant to the Restated Application for Interconnected VoIP Numbering Authorization ("Restated Application") filed by Windstream IPES in the abovementioned docket.¹ We provide this information at the request of Commission staff to update information regarding the Robocall Mitigation Database ("RMD") and Windstream IPES's indirect foreign ownership.

RMD Filing

Commission staff asked Windstream IPES to provide an update regarding the status of its filing in the RMD. As stated in the Restated Application, Windstream IPES' ultimate parent company, Windstream Holdings II, LLC ("Holdings II"), holds its interest in Windstream IPES through a vertical chain of several wholly-owned subsidiary companies that are U.S. domestic entities, including Windstream Communications, LLC ("Windstream Communications").² On July 6, 2023, Windstream Communications updated its RMD filing for itself and all of its subsidiaries, including Windstream IPES, stating that Windstream IPES and its affiliates have

¹ Letter from Nicole Winters, Senior Counsel, Windstream IPES, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 20-416 (filed July 28, 2022).

² Restated Application, 1-2.



fully implemented the STIR/SHAKEN framework across their entire networks.³ A copy of the attachment submitted with the certification is attached hereto as Exhibit A, and specifically lists PAETEC iTEL, L.L.C., FRN 0015247810, as compliant.

Ownership Information

Commission staff asked Windstream IPES to update the ownership information provided in the Restated Application.⁴ The Restated Application noted that, when it was filed, Holdings II had filed a Petition for Declaratory Ruling (“Petition”) to permit foreign investors to own up to 100% of equity and voting interests in Holdings II, and that the Petition was then under review by the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Team Telecom”).⁵ On January 18, 2023, Holdings II entered into a Letter of Agreement (“LOA”) with certain Team Telecom agencies, concluding the national security review of Holdings II’s foreign ownership and its subsidiaries’ operations.⁶ The International Bureau granted the Petition on June 2, 2023.⁷

Today, the foreign ownership of Holdings II, and thus the indirect foreign ownership of Windstream IPES, remains the same as Holdings II disclosed to the Commission in the Petition, as amended and supplemented, and finally approved by the International Bureau.⁸ Holdings II has committed to the Commission that it will monitor its ownership, file annual certifications as to continuing compliance, and notifications within fifteen calendar days should it discover non-compliance.⁹

Referral to Team Telecom Not Required

To the extent Commission staff may consider a petition for access to numbering resources to be referable to Team Telecom, the instant application should be excluded from any such referral. The Commission stated that it would exclude international Section 214 applications from referral to Team Telecom “where the applicant has an existing mitigation agreement, there are no new reportable foreign owners of the applicant since the effective date of

³ See RMD Compliance Filing for Windstream Communications LLC, RMD0012713, FRN 0014409924 (filed July 7, 2023).

⁴ Restated Application, 1-2.

⁵ *Id.*; see Public Notice, *Applications Granted for the Transfer of Control of Windstream Holdings, Inc., Debtor-in-Possession, and Subsidiaries*, 35 FCC Rcd 10076 (2020).

⁶ See Petition to Adopt Conditions to Authorizations and Licenses, *Windstream Holdings II, LLC*, ISP-PDR-20201021-00010 (filed Feb. 3, 2022).

⁷ Public Notice, *Grant of Windstream Holdings II, LLC Petition for Declaratory Ruling*, DA 23-475, IB Docket No. 22-129, ICFS File Nos. ISP-PDR-20201021-00010, ISP-AMD-20230330-00005 (IB released June 2, 2023) at 17.

⁸ See Restated Petition for Declaratory Ruling, IB Docket No. 22-129, ISP-PDR-2020-1021-00010 (filed Oct. 26, 2021). Counsel submitted amendments to the ownership information on May 13, 2022 and March 31, 2023, and supplements to the ownership information on December 21, 2022, January 11, 2023, January 17, 2023, and March 14, 2023.

⁹ Letter from Jeffrey J. Carlisle and David S. Keir, Counsel to Holdings II, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 22-129; ICFS File Nos. ISP-PDR-20201021-00010, ISP-AMD-20230330-00005 (filed Apr. 27, 2023).

the mitigation agreement, and the applicant agrees to continue to comply with the terms of that mitigation agreement”¹⁰

Assuming these same criteria would apply to requests for direct access to numbering resources, then this request should be excluded: Windstream IPES is fully subject to the LOA with Team Telecom; there are no new reportable foreign owners since the effective date of the LOA; and Windstream IPES agrees to continue to comply with the terms of the LOA.

Thank you for your consideration of this supplemental information. If you have any questions about this filing, please do not hesitate to reach us by email or telephone.

Respectfully submitted,

PAETEC iTEL, L.L.C.

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¹⁰ *Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, Report and Order, 35 FCC 10927, 10938 (2020).

EXHIBIT A

**WINDSTREAM ROBOCALL MITIGATION DATABASE
FILING ATTACHMENT**

Windstream Holdings II, LLC
FRN 0030023923

Windstream Communications, LLC
FRN 0014409924

July 6, 2023

Robocall Mitigation Database Certification Attachment

This filing is made by Windstream Holdings II, LLC on behalf of itself and its operating subsidiaries identified in Attachment A (collectively “Windstream”) in compliance with the FCC’s *Sixth Report and Order and Fifth Report and Order* (Gateway Provider Order) in the Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor dockets.

1. Specific reasonable steps Windstream has taken to avoid carrying or processing illegal robocall traffic:

Windstream has taken significant steps to avoid carrying or processing illegal traffic. Windstream serves as a gateway provider in only a small portion of its total network traffic. The vast majority of Windstream call traffic originates and terminates domestically.

Using reasonable analytics, Windstream employs a rigorous process for manually blocking calls originating on its network that are suspected to be spam, robocalls, or otherwise fraudulent. Windstream continues to participate in the FCC-sponsored Industry Traceback Group and remains engaged at both the federal and state levels of robocall policymaking.

For calls originated by its wholesale customers, Windstream blocks calls that can be identified as coming from known scam-related inbound-only numbers (e.g., Internal Revenue Service inbound, toll-free number). This currently is a manual process and is implemented as Windstream becomes aware of abusers. Each day at 2PM EST, a report of the highest offending Automatic

Number Identifications (“ANIs”) for the previous 36 hours is generated. Windstream then uploads those ANIs to its High Velocity, Short Duration (HVSD) database. Known legitimate numbers are scrubbed from the report (i.e. known disaster/emergency services call centers). Windstream then generates a Routing Block File and sends it to its internal Network Routing team for implementation. The team performs final checks-and-balances and uploads to Windstream’s routing platform.

In addition, Windstream has partnered with a major national vendor to utilize its reputational database automated solution to identify calls as likely spam in the Caller ID service for calls where the called party is a Windstream end-user (business or consumer).

Windstream also has several line-specific features which can assist customers with blocking unwanted calls. These include:

Anonymous Call Rejection by which an incoming call will automatically be blocked if the caller has blocked the Caller ID – i.e., blocked the display of the originating number. This feature is automatically activated without charge on customer lines and may be deactivated by the customer using *87.

Selective Call Acceptance which permits a customer to create a list of numbers that they will accept calls from. This feature is free of charge and is accessible directly from the customer’s phone by using the *64 feature.

Selective Call Rejection by which a customer can block calls from a specific number. This feature is free of charge and is accessible directly from the customer's phone by using the *60 feature.

Consumers who need additional assistance, may call 800-341-1991 or access information on Windstream's website at <https://www.windstream.com/support/phone/Features-and-Information-of-Local-Phone>. Enterprise customers who need additional assistance, may call 800-600-5050.

Windstream has implemented STIR/SHAKEN technology solutions on the IP portions of its network and has met the FCC deadline for registration in the Robocall Mitigation Database. Windstream is also monitoring and participating in industry working groups to address gaps in existing STIR/SHAKEN standards.

Additionally, Windstream has deployed the Reputational Database/Spam Identification Method (offered by a major provider of such services) which is the most current technology. The FCC's recent authorized permissive call-blocking with customer opt-out option is not currently technically feasible and not available on a commercial basis. (Unintended blocking of large volumes of legitimate calls, i.e., false positives, which presents a significant hurdle.) Nevertheless, Windstream is actively monitoring and is an active industry participant in the development of call blocking options.

Windstream is actively testing and monitoring development of non-IP technology solutions for illegal and unwanted robocalls for future deployment.

2. 24 Hour Traceback Request Commitment

Windstream commits to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with

such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

/s/ Paul St. Clair

Paul St. Clair

Director, Federal Government Affairs

Paul.stclair@windstream.com

(202) 997-8746

Attachment A
Windstream Operating Companies

FRN	ENTITY NAME
0028311876	American Telephone Company LLC
0003775285	Broadview Networks, Inc.
0003744935	Business Telecom, LLC
0015799133	Cavalier Telephone Mid-Atlantic, LLC
0003757275	Cavalier Telephone, LLC
0004328464	Choice One Communications of Connecticut, Inc.
0008190662	Choice One Communications of Maine, Inc.
0004328480	Choice One Communications of Massachusetts, Inc.
0004328506	Choice One Communications of New York, Inc.
0004328530	Choice One Communications of Ohio, Inc.
0004328555	Choice One Communications of Pennsylvania, Inc.
0004328563	Choice One Communications of Rhode Island, Inc.
0018746727	Choice One Communications Resale, L.L.C.
0004328498	Choice One of New Hampshire, Inc.
0005078829	Connecticut Broadband, LLC
0008841959	Conversent Communications of Connecticut, LLC
0008841900	Conversent Communications of Maine, LLC
0008841876	Conversent Communications of Massachusetts, Inc.
0008842007	Conversent Communications of New Hampshire, LLC
0008841983	Conversent Communications of New Jersey, LLC
0008841991	Conversent Communications of New York, LLC
0008841975	Conversent Communications of Rhode Island, LLC
0005013669	CTC Communications Corp.
0005183025	DeltaCom, LLC
0004967741	Georgia Windstream, LLC
0013102439	Intellifiber Networks, LLC
0004371043	LDMI Telecommunications, LLC
0006194187	Lightship Telecom, LLC
0028299816	Masscomm, LLC
0003716073	McLeodUSA Telecommunications Services, LLC
0004071262	Network Telephone, LLC
0004966552	Oklahoma Windstream, LLC
0016991374	PAETEC Communications of Virginia, LLC
0011017795	PAETEC Communications, LLC
0015247810	PAETEC iTel, LLC
0015669492	Talk America of Virginia, LLC
0004319430	Talk America, LLC
0004967808	Texas Windstream, LLC
0015620198	The Other Phone Company, LLC

FRN	ENTITY NAME
0003721396	US LEC Communications, LLC
0003721396	US LEC of Alabama, LLC
0004987814	US LEC of Florida, LLC
0004987848	US LEC of Georgia, LLC
0004987798	US LEC of Maryland, LLC
0004987707	US LEC of North Carolina, LLC
0004987715	US LEC of Pennsylvania, LLC
0004987780	US LEC of South Carolina, LLC
0004987723	US LEC of Tennessee, LLC
0004987764	US LEC of Virginia, LLC
0004328605	US Xchange of Illinois, L.L.C.
0004328597	US Xchange of Indiana, L.L.C.
0004328589	US Xchange of Michigan, L.L.C.
0004328613	US Xchange of Wisconsin, L.L.C.
0003783123	Valor Telecommunications of Texas, LLC dba Windstream Communications Southwest
0001856145	Windstream Accucomm Telecommunications, LLC
0004966594	Windstream Alabama, LLC
0006580518	Windstream Arkansas, LLC
0008343162	Windstream Buffalo Valley, Inc.
0001687813	Windstream Communications Kerrville, LLC
0004941142	Windstream Communications Telecom, LLC
0014409924	Windstream Communications, LLC
0003762010	Windstream Concord Telephone, LLC
0005386172	Windstream Conestoga, Inc.
0003735776	Windstream D&E Systems, Inc.
0003271871	Windstream D&E, Inc.
0004967337	Windstream East Texas, LLC f/k/a Windstream Sugar Land, LLC
0003738465	Windstream EN-TEL, LLC
0004329363	Windstream FiberNet, LLC f/k/a EarthLink Carrier, LLC
0004967360	Windstream Florida, LLC
0004967725	Windstream Georgia Communications, LLC
0004967840	Windstream Georgia Telephone, LLC
0004967030	Windstream Georgia, LLC
0003911385	Windstream Iowa Communications, LLC
0005089446	Windstream Iowa-Comm, LLC
0013623335	Windstream IT-Comm, LLC
0004565008	Windstream KDL, LLC
0005095856	Windstream Kentucky East, LLC
0004967816	Windstream Kentucky West, LLC
0003738424	Windstream Lakedale Link, LLC
0003738416	Windstream Lakedale, Inc.

FRN	ENTITY NAME
0001959758	Windstream Lexcom Communications, LLC
0006814990	Windstream Long Distance, LLC
0004967774	Windstream Mississippi, LLC
0004965992	Windstream Missouri, LLC
0003708575	Windstream Montezuma, LLC
0004966099	Windstream Nebraska, Inc.
0003720471	Windstream New Edge, LLC f/k/a EarthLink Business, LLC
0004967055	Windstream New York, Inc.
0007345754	Windstream Norlight, LLC
0004967634	Windstream North Carolina, LLC
0018879585	Windstream NorthStar, LLC
0002704682	Windstream NTI, LLC
0004944187	Windstream NuVox Arkansas, LLC
0004944302	Windstream NuVox Illinois, LLC
0004946091	Windstream NuVox Indiana, LLC
0004944229	Windstream NuVox Kansas, LLC
0004944245	Windstream NuVox Missouri, LLC
0004945457	Windstream NuVox Ohio, LLC
0004944260	Windstream NuVox Oklahoma, LLC
0004319414	Windstream NuVox, LLC
0004986147	Windstream of the Midwest, LLC
0006236608	Windstream Ohio, LLC
0004967790	Windstream Oklahoma, LLC
0004967683	Windstream Pennsylvania, LLC
0030023899	Windstream Services, LLC
0004967014	Windstream South Carolina, LLC
0004207239	Windstream Standard, LLC
0004967691	Windstream Western Reserve, LLC