



January 23, 2019

Federal Communications Commission
445 12th Street SW, Washington, DC 20554

To whom it may concern:

FCC Docket Number for Contributions: WC Docket 06-122
499 Filer ID: 832024

We wish to appeal the decision by USAC to assess 247VoIP Services a late filing charge of \$700. We appealed this decision to USAC last December and we received a denial email today, January 23.

This is our first filing of the 499A. We are de minimis and our understanding was we owed nothing to USAC.

Secondly, we did not realize we even needed to file the form 499A until last September when we received an invoice from NANP. I should note this invoice actually went to our Email spam folder. I discovered it last October. I have attached the invoice. It was in the process of trying to understand why NANP sent us an invoice that we learned we were still required to file the form 499A. USAC informed us they had sent out a reminder email to file. This email had also ended up in our spam folder unnoticed. I should also note USAC never sent us any notices by regular mail. Upon learning of the filing requirement, we immediately submitted the 499A on October 15, 2018.

Lastly, we do not have the revenue to offset this \$700 charge as we are still not profitable. For these reasons we request that you waive the late filing charge of \$700.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Obi'.

Mike Obi
Director
247VoIP Services, LLC
mike@247voipservices.com
customercare@247voipservices.com

North American Numbering Plan (NANP)

Invoice

c/o **Welch LLP**

Billing and Collection Agent
P.O. Box 223231
Pittsburgh, PA 15251-2231
www.nanpfund.com

Bill To: 247 VoIP Services LLC
130 E. Voris Street
Suite A
Akron, OH 44311
USA

FCC Filer ID	Invoice No.	Invoice Date	Date Due
832024	IN097328	Sep 12, 2018	Oct 12, 2018

Description	Amount
Annual fee for the Numbering Administration costs in North America for October 2018 to September 2019	25.00 USD
Late filing fee for FCC Form 499A	100.00 USD
<p>To avoid interest charges payment must be received by <u>October 12, 2018</u></p> <p>Please include your FCC Filer ID on your payment</p> <p>See legal notice and payment options on the following pages</p>	

For billing enquiries, questions or concerns, please call 613-760-4512 or visit our website at www.nanpfund.com

Payable To: North American Numbering Plan
c/o Welch LLP
P.O. Box 223231
Pittsburgh, PA 15251-2231

Balance

125.00 USD

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NORTH AMERICAN NUMBERING PLAN (NANP)

IMPORTANT LEGAL INFORMATION ABOUT YOUR ACCOUNT AND YOUR RIGHTS AND OBLIGATIONS

- DEMAND FOR PAYMENT, DUE DATE & DELINQUENCY.** Under 31 U.S.C. § 3701, 31 C.F.R. § 901.2 AND 47 C.F.R. § 1.1911, this is a Demand for Payment of your **BALANCE DUE**, which is a DEBT owed to the United States. Any portion of that amount unpaid after the PAYMENT DUE DATE (*i.e.*, the DATE OF DELINQUENCY) is a DELINQUENT DEBT for which we (including the FCC) may take COLLECTION ACTION against you as a DELINQUENT DEBTOR. Under 31 U.S.C. § 3717, we assess interest, penalties and administrative charges (below), from the DATE OF DELINQUENCY, and if the DEBT remains delinquent, we will refer the matter to the Secretary of the Treasury (Treasury) or the Department of Justice (Justice). COLLECTION ACTION may also include judicial enforcement by Justice and/or administrative action by the FCC or Treasury, *e.g.*: administrative offset, denial of certain federal benefits, and/or referral to private collection attorneys, any or all of which may incur additional charges. Under 31 U.S.C. § 3716, the United States may collect the debt by administrative offset. In addition, the FCC will withhold action on any pending application (Red Light) made by a DELINQUENT DEBTOR, and the delinquency will be reported to credit-reporting agencies. You may learn more about the DCIA by reading 31 U.S.C. §§ 3701, 3711, 3716, 3717, and 3720B, the Federal Claims Collection Standards (*e.g.* 31 C.F.R. § 900.1, *et seq.*), and 47 C.F.R. § 1.1901, *et seq.*
- RECORD REVIEW.** If you believe the amount of the BALANCE DUE is in error, you may ask to inspect, or for us to review, the records relevant to this invoice, by submitting, within 15 days of this invoice date, a written request for inspection or review specifying the nature of the error(s) to the NANP HELPDESK.
- PAYMENT PLAN.** If you are unable to pay the BALANCE DUE in full, you may request a written payment plan agreement, the terms of which will require interest and administrative charges.
- CONSEQUENCES IF YOU DO NOT PAY THE FULL BALANCE DUE.** A failure to submit payment may result in sanctions, including, but not limited to, administrative or judicial proceeding to recover the DELINQUENT DEBT, and all accrued administrative charges, penalties, and interest, as set forth below.
INTEREST, PENALTIES, AND CHARGES. Interest at the annual rate equal to the U.S. Treasury rate as of the DATE OF DELINQUENCY plus 3.5 percent accrues from that DATE until the DEBT is paid in full. This interest rate incorporates administrative charges of collection pursuant to 47 C.F.R. § 1.1940. Under 31 U.S.C. § 3717(d), if the full amount due is paid within 30 days of the original due date, the accrued interest is waived. Moreover, a penalty of 6% a year accrues on any part of the DEBT that is more than 90 days DELINQUENT. If the DEBT remains unpaid, the full amount of the DELINQUENT DEBT, plus accrued interest and penalties, may be transferred to the Treasury or Justice for COLLECTION ACTION, and you will be required to pay the administrative costs of processing and handling a DELINQUENT DEBT as set by the Treasury (currently 28 percent of the debt). These requirements are set out at 31 U.S.C. § 3717.
- LATE FILING FEES FOR INCOMPLETE OR LATE-FILED WORKSHEETS.** Telecommunications Reporting Worksheet (Worksheet) Forms 499-A must be filed by Apr 1 with USAC. A Worksheet not received by USAC when due is DELINQUENT, and if more than 14 days DELINQUENT, NANP will assess a LATE FILING FEE of \$100. The LATE FILING FEE will be included in the BALANCE DUE. Any portion of the LATE FILING FEE unpaid after the DUE DATE will be DELINQUENT and subject to DCIA procedures discussed above, including INTEREST, PENALTIES and CHARGES.

How to Make Payments

Payment for One Company Only

Include the FCC Filer ID and invoice number on the face of the check.

Payment for Multiple FCC Filer IDs

If paying for more than one FCC Filer ID, please complete this worksheet and submit with your payment.

If you are submitting an electronic payment, please send your worksheet by fax or e-mail to NANP HELPDESK.

	Filer ID	Invoice Number	Amount
1			\$
2			\$
3			\$
4			\$
5			\$
6			\$
	Total Amount		\$

*The Total Amount must be equal to the payment amount submitted.

NOTE: By using the payment worksheet, you certify that payment made on behalf of another filer is in consideration of fair value on behalf of the payer, and the funds will not be reallocated, reapplied or returned in the event of insolvency or bankruptcy.

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Checks or wire transfers should be made payable to North American Numbering Plan.

Electronically via EFT - identify the transmittal as a NANP Payment and indicate the Filer ID and invoice number.

If you are **unable to submit the Filer ID with the EFT**, please fax or email the payment worksheet associated with the EFT to NANP HELPDESK (see previous page) to ensure correct posting of your payment.

Welch LLP taxpayer identification number is 98-0191285. A W-8IMY is available upon request.

*****Do Not Send Payments for Other FCC Funds with Your NANP Payment*****

For regular payments by check:	WELCH LLP P.O. BOX 223231 PITTSBURGH, PA 15251-2231
For overnight payments:	WELCH LLP ATTN: LOCKBOX NUMBER 223231 500 ROSS STREET 154-0455 PITTSBURGH, PA 15251 TEL: 412-234-4381 Note inside the Express Envelope: <i>"DEPOSIT IN P.O. BOX 223231"</i>
For electronic funds transfers (EFT):	ABA #: 043000261 ACCOUNT #: 019-6058 MELLON BANK: PITTSBURGH, PA Note: Identify the transmittal as "NANP PAYMENT"
We Do Not Accept Credit Card Payments	

Companies with annual fees of \$1,200 or more may choose to pay in twelve equal monthly installments. First payment is due October 12th. The remainder of the payments are due the 12th of each subsequent month. Final monthly payment would be due September 12th of the following year.

Telecommunications service providers who qualify for the Universal Service Fund de minimis exemption are **NOT EXEMPT** from contributing to the North American Numbering Plan Administration Fund.

NANP HELPDESK

Welch LLP Billing and Collection Agent

P.O. Box 223231

Pittsburgh, PA 15251-2231

Phone: (613)760-4512

Fax: (613)236-8258 Attention : NANP FUND

E-mail: nanp@welchllp.com

Visit us Online at www.nanpfund.com

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