

April 10, 2019

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

***Re: Request for Confidential Treatment to Application of NumberBarn, LLC for  
Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of  
the Commission's Rules***

Dear Ms. Dortch,

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, NumberBarn, LLC ("NumberBarn") hereby submits its application requesting authorization to obtain numbering resources. This filing includes confidential information. As contemplated by the Commission's rules, we are filing the public version electronically and the confidential version via first-class mail.

NumberBarn, respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. § 0.457 and 0.459, the Commission withhold from public inspection, Exhibit A to this application in its entirety as confidential because the documents contain trade secrets and commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4).

The information in Exhibit A is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. NumberBarn respectfully submits that it would suffer substantial competitive harm if this information were disclosed. Exhibit A is accordingly marked with "Confidential and Proprietary – Filed Under Seal Pursuant to 47 C.F.R. §0.459."

NumberBarn's application follows this cover letter.

Respectfully Submitted,



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*Counsel to NumberBarn, LLC*

**PUBLIC VERSION**

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

*In the Matter of* )  
 )  
NumberBarn, LLC )  
Applicant ) WC Docket No. 18-\_\_\_\_\_  
 )  
For Authorization to Obtain Numbering )  
Resources Pursuant to Section 52.15(g) of )  
the Commission’s Rules )

**APPLICATION OF NUMBERBARN, LLC FOR AUTHORIZATION TO OBTAIN  
NUMBERING RESOURCES**

Pursuant to 47 C.F.R §52.15(g)(3), ,NumberBarn, LLC (“NumberBarn”), a provider of interconnected voice over Internet Protocol (“IVoIP”) service, hereby respectfully requests authorization from the Federal Communications Commission (“Commission”) to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (“Numbering Administrators”).

As set forth in the Commission’s Numbering Order<sup>1</sup>, an IVoIP provider may obtain numbering resources from Numbering Administrators upon a showing of the provider’s authority to provide service in the service area for which the numbering resources are requested. In support of this application, NumberBarn provides the following information.

**I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)**

**A. § 52.15(g)(3)(i)(A)**

**Name:** NumberBarn, LLC

**Address:** P.O. Box 3, Poway, California 92074

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<sup>1</sup> *Number Policies for Modern Communications*, 30 FCC Rcd. 6839 (2015).

## PUBLIC VERSION

**Telephone Number:** 858-630-7443

**Personnel qualified to address regulatory/Compliance/911 issues:**

Matthew Veling  
P.O. Box 3  
Poway, CA 92074  
760-877-8759  
[mveling@numberbarn.com](mailto:mveling@numberbarn.com)

**B. § 52.15(g)(3)(i)(B)**

NumberBarn hereby acknowledges that: grant of the authorization sought by this application is subject to compliance with applicable commission numbering rules, numbering authority delegated to the states, and industry guidelines and practices regarding numbering as applicable to telecommunications carriers.

**C. § 52.15(g)(3)(i)(C)**

NumberBarn hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least thirty (30) days before requesting numbers from the Numbering Administrators.

**D. § 52.15(g)(3)(i)(D)**

NumberBarn hereby provides its capability to provide service within sixty (60) days of the numbering resources activation date. NumberBarn has agreements in place with carrier partners who in turn have interconnection agreement in effect with local exchange carriers.

NumberBarn has served as a VoIP provider since 2014. It maintains well-established operations and procedures and has experienced personnel to support numbering requests and routing. NumberBarn will not obtain numbering resources in areas where it does not have direct PSTN connectivity until it has executed agreements with carrier partners to host NumberBarn numbers and provide PSTN connectivity.

## PUBLIC VERSION

As evidence of its operational readiness to begin providing service within sixty (60) days of the numbering activation date, attached hereto as confidential Attachment A is an interconnection agreement between NumberBarn and a local exchange carrier. NumberBarn is submitting Attachment A separately in accordance with its request for confidential treatment.

### **E. (47 C.F.R. § 52.15(g)(3)(i)(E)-(G))**

NumberBarn hereby certifies to the following:

- a) NumberBarn complies with its Universal Service Fund contribution obligations under 47 C.F.R. Part 54, subpart H; its Telecommunications Relay Service contributions obligations under 47 C.F.R. § 64.604(c)(5)(iii); its NANP and LNP administration contribution obligations under 47 C.F.R. §§ 52.17 and 52.32; its obligations to pay regulatory fees under 47 C.F.R. § 1.1154; and its 911 obligations under 47 C.F.R. part 9.
- b) NumberBarn hereby certifies that it possesses the financial, managerial, and technical expertise to provide reliable service.
- c) Attached hereto as Ex. B are names and biographies of the Companies key management personnel. NumberBarn states and avers that none of the identified personnel is being or has been investigated by the Commission, by any law enforcement, or by any regulator agency for failure to comply with any law, rule or order.
- d) Pursuant to 47 C.F.R. §§ 1.2001 and 1.2002, no party to the application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.<sup>2</sup>

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<sup>2</sup> See 21 U.S.C. §862.

## **PUBLIC VERSION**

### **II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)**

As required in 47 C.F.R. §52.15(g)(3)(iv), NumberBarn will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within (thirty) 30 days of any changes. NumberBarn will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

### **III. CONCLUSION**

Pursuant to Section 52.15(g)(3)(i) of the Commission's rules, NumberBarn respectfully requests the Commission to grant this application for authorization to obtain numbering resources from Numbering Administrators as an IVoIP provider.

Respectfully submitted this 10 day of April, 2019,



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*Counsel to NumberBarn, LLC*

**PUBLIC VERSION**

**Exhibit A**

**Interconnection Agreement**

**Confidential and Proprietary – Filed Under Seal  
Pursuant to 47 C.F.R. §0.459**

## PUBLIC VERSION

### Exhibit B

#### Management Biographies

##### **Matthew Veling**

An experienced leader and entrepreneur, Matthew has nearly two decades of executive leadership experience, with over a decade of experience in the telecommunications industry. Matthew has a deep understanding of telecommunications – from product design, to operations, to regulatory and tax compliance matters.

A Gallup-Certified Strengths Coach, Matthew builds capacity by connecting people and purpose, cultivating strengths-based teams, and creating management systems that allow organizations to flourish.

Matthew has been an integral part of several VoIP and SaaS companies, and understands the workflows, systems and processes that will be involved as NumberBarn enters the VoIP Numbering space.

Matthew holds a Bachelor's Degree from California State University San Marcos, and an M.Div. from Azusa Pacific University. He has completed graduate studies in Community Development at Eastern University, and is currently enrolled in the Doctorate of Ministry, Urban Ministry/Community Development program at Fuller Theological Seminary.

##### Key roles:

###### *Co-founder and CEO*

NumberBarn, LLC

Sep 2014 – present

Matthew is a co-founder of NumberBarn, and he provides executive leadership, product management, and handles compliance, tax, and regulatory matters.

###### *Strengths Coach & Trainer*

Center for Executive Excellence, Inc.

Jan 2015 – Jan 2017

Matthew designed strengths-based programs to improve individual performance, increase management effectiveness, and produce highly engaged teams.

###### *Co-founder, Product Manager, Cultural Architect*

Phone.com, Inc.

Jul 2007 – Jul 2014

Matthew provided product management, product oversight, feature cultivation, and cross-department integration. He implemented systems and processes to support Phone.com's VoIP product.

## PUBLIC VERSION

### Brian McNeill

An experienced leader, product, and UI/UX expert, Brian has managed on-line brand and user experience throughout his career, including web site development, communications, and overall company strategy. He has worked both in telecommunications and in SaaS technology companies to direct product and feature development decisions, and to identify appropriate web solutions.

With over a decade of telecommunications experience, Brian is well suited to drive product decisions that work in the VoIP OTT space. He relies on his deep understanding of numbering issues, including number ordering and porting processes, to help him to create simple and efficient products and processes.

#### Key roles:

##### *Co-founder*

NumberBarn, LLC

Sep 2014 – present

Brian is a co-founder of NumberBarn, and he provides executive leadership, product management, and brand management. Brian's in-depth understanding of telecommunications, especially in the VoIP OTT space, helps him make product design decisions with simplicity, usability, and efficiency in mind.

##### *Co-founder, Brand Manager, UI / UX Developer*

Phone.com, Inc.

Jul 2007 – Aug 2014

Brian provided product management, product oversight, brand management, and directed UI / UX during his time at Phone.com. With a deep understanding of the Phone.com products, he created customer-facing UX, as well as back office systems to support Phone.com's VoIP product.

##### *Product Manager, Web Director*

TierraNet, Inc.

Sep 2005 – May 2012

Brian provided product management, content development, and communication strategy to TierraNet as it grew to become one of the largest domain registrars. During this time, he honed his experience in VoIP, SaaS, and scale within the web hosting and telecommunications industries.