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May 10, 2018

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

Re: Comments on Direct Case in WC Docket No. 18-60

Dear Ms. Dortch:

I write on behalf of Onvoy, LLC d/b/a Inteliquent (“Inteliquent”) to provide the Commission with information in response to the Order Designating Issues for Investigation in WC Docket No. 18-60 (“Order”), specifically with regard to the demand forecast for traffic volumes on the centralized equal access (“CEA”) network of Iowa Network Access Division d/b/a Aureon (“Aureon”).

Inteliquent offers network-based voice and messaging services to wireless, cable, local exchange carriers (“LECs”), VoIP, and other communications service providers. Among other offerings, Inteliquent provides outbound voice service pursuant to which it carries long distance traffic on behalf of originating carriers.

As the Commission is aware, certain LECs and/or their customers engage in various forms of traffic stimulation, the core of which involve high call volume operations such as chat lines and “free” conference calls. In Inteliquent’s experience, many of these traffic stimulation operations use telephone numbers assigned to LECs that are subtended to Aureon’s CEA network. Thus, large volumes of traffic are handed off by intermediate providers, such as Inteliquent, to Aureon for termination by Aureon to the subtending LECs serving call stimulation operations.

Inteliquent accordingly has insight into possible demand for use of Aureon’s CEA network. Based on Inteliquent’s current projections derived from recent traffic flows, Inteliquent could be delivering up to 250 million minutes per month to Aureon in the coming months.

Inteliquent hopes this information will be useful to the Commission in addressing the demand forecast issues detailed in the Order. Please direct any questions to the undersigned.

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Sincerely,

/s/ Matthew S. DelNero

Matthew S. DelNero
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Counsel for Inteliquent