

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

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**In the Matter of**

**WC Docket No. \_\_\_\_\_**

**ELECTRIC LIGHTWAVE, LLC D/B/A  
ALLSTREAM**

**For Authorization to Obtain Numbering  
Resources Pursuant to Section 52.15(g) of  
The Commission's Rules**

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**APPLICATION OF ELECTRIC LIGHTWAVE, LLC D/B/A ALLSTREAM FOR  
AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Electric Lightwave, LLC d/b/a Allstream ("Allstream"), pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, respectfully requests authorization to obtain numbering resources as described below.

As set forth in the Commission's *Numbering Order*,<sup>1</sup> an interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon a showing that it is authorized to provide service in the area for which the numbering resources are requested. Such authorization may be obtained upon an application to the Commission containing the information detailed in Sections 52.15(g)(3)(i)(A)-(F) of the Commission's Rules. Allstream hereby requests the Commission grant it that authorization. In support of this application, Allstream provides the following information:

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<sup>1</sup> *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015).

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

### **(A) §52.15(g)(3)(i)(A)**

**Name:** Electric Lightwave, LLC d/b/a Allstream

**Address:** 18110 SE 34<sup>th</sup> St., Building One, Suite 100, Vancouver, WA 98683

**Telephone:** 1-866-468-3472

**Qualified Personnel:** Douglas Denney, Vice President, Costs & Policy

### **(B) §52.15(g)(3)(i)(B)**

Allstream hereby acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's Rules is subject to compliance with applicable Commission numbering rules as well as to the numbering authority delegated to the states. Allstream hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, just as to telecommunications carriers.

### **(C) §52.15(g)(3)(i)(C)**

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

### **(D) §52.15(g)(3)(i)(D)**

Allstream hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. Allstream currently holds approximately 1600 number blocks directly. Allstream is prepared to obtain an IPES OCN upon approval of its application. It has interconnection agreements in place for routing calls to ILECs in several states; and has, in some cases, negotiated direct IP interconnection with other carriers.

Allstream has developed porting tools to enable carriers to submit porting requests and has accomplished bulk ports with no difficulty. Allstream already has in place the necessary procedures to enable it to place numbers into service within 60 days of activation. Under its current agreements and established procedures, Allstream will be able to place nearly all numbers into service within a similar timeframe. As proof of its facilities readiness, Allstream has attached a statement describing (1) interconnection agreements between Allstream and several ILECs; (2) its negotiations with the carrier partners it will use to host Allstream numbers and provide PSTN connectivity in areas where Allstream does not currently have direct PSTN connectivity; and (3) that Allstream 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 Allstream numbers and provide PSTN connectivity. This statement is attached as CONFIDENTIAL “Exhibit A.”

**(E) §52.15(g)(3)(i)(E)**

Allstream hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17, 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9.

**(F) §52.15(g)(3)(i)(F)**

Allstream hereby certifies that it has the financial, managerial, and technical expertise to provide reliable service. Allstream has the capabilities to seamlessly place numbers

into service, and successfully port and route calls. Allstream's experience with number porting enables it, along with its carrier partners, to create routing arrangements that seamlessly deliver calls to numbers directly assigned to Allstream. Allstream has an established web interface for processing local service requests for porting numbers, allowing providers to request credentials and submit porting requests. Key Allstream management and technical personnel are listed below. None of the identified personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

**Key Personnel:** Raymond Lahoud, Chief Operating Officer  
Michael Strople, President  
Dan Vucinic, Vice President, Voice  
**(G) §52.15(g)(3)(i)(G)**

Allstream hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

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

As required by Section 52.15(g) (3) (iv), Allstream 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 30 days of any changes. Allstream 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 Commissions' Rules, Allstream respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Douglas Denney', with a stylized flourish at the end.

By: \_\_\_\_\_

Douglas Denney  
Vice President, Costs & Policy  
Allstream  
18110 SE 34<sup>th</sup> St.  
Building One, Suite 100  
Vancouver, WA 98683

**CONFIDENTIAL**  
**EXHIBIT A**

**Allstream – Proof of Facilities Readiness 52.15 (G)(2) Statement**

**Electric Lightwave, LLC dba Allstream**

Electric Lightwave, LLC dba Allstream (“Allstream”) is a Competitive Local Exchange Carrier (CLEC) based in Vancouver, WA that provides facilities-based and non-facilities based services, including interconnected Voice-over-Internet-Protocol (VoIP) service.

Allstream is registered to do business in all of the contiguous United States, and Hawaii.

Allstream has a CPCN in all states where its service offerings require a CPCN.

Allstream offers local voice, long distance, data, internet, Integrated T1s, Dedicated Internet Access, XDSL Services, Ethernet, MPLS and VoIP services.

Allstream can seamlessly provide VoIP services to its end users because it has successfully deployed the necessary tools, terms and conditions.

Upon receipt of numbering resources under its IPES OCN, Allstream will:

- Provide VoIP services to its customers using our existing equipment, within 60 days;
- Comply with all existing numbering rules;
- Certify that the number resources are “in service”;
- Use numbering resources efficiently;
- Submit the NRUF on a semi-annual basis, participate in number pooling and comply with number portability requirements; and
- Comply with all of the regulatory mechanisms that are applicable to telecommunications carriers, to ensure compliance with federal and state numbering resource optimization procedures.
- Allstream 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 Allstream numbers and provide PSTN connectivity.

**[REDACTED INFORMATION]**

**[END REDACTION]**

Allstream Active Interconnect Agreements

<b>State</b>	<b>ILEC</b>
Arizona	CenturyLink QC (former Qwest)
California	AT&T Pacific Bell
California	Consolidated Communication (SureWest)
California	Frontier Citizens
Idaho	Frontier Northwest
Idaho	CenturyLink QC (former Qwest)
Nevada	CenturyLink EQ (former Embarq)
Nevada	AT&T Nevada Bell
Oregon	CenturyLink CQ (former Qwest)
Oregon	Frontier Northwest
Oregon	CenturyLink CTel (former CenturyTel)
Oregon	CenturyLink EQ (former Embarq)
Utah	CenturyLink QC (former Qwest)
Washington	CenturyLink CQ (former Qwest)
Washington	Frontier Northwest
Washington	CenturyLink CTel (former CenturyTel)
Washington	CenturyLink EQ (former Embarq)