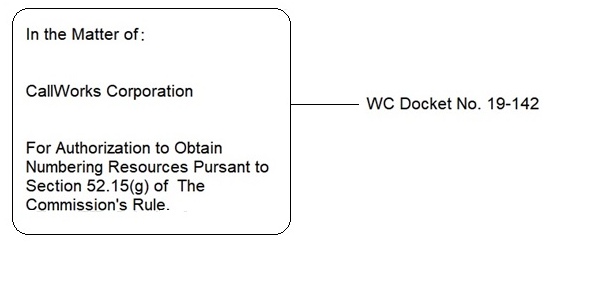
**Before the**

**FEDERAL COMMUNICATIONS COMMISSION**

**Washington, D.C. 20554**

**RE: WC Docket Supplement – No. 19-142**

**SUPPLEMENT TO THE APPLICATION OF CALLWORKS CORPORATION**

**FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

On April 16, 2019, CallWorks Corporation pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requested authorization to obtain numbering resources as an Internet Protocol Enabled Services (IPES) provider. In response to the application, the Wireline Competition Bureau requested additional information to demonstrate proof of facilities readiness under Direct Access Order (FCC 15-70) paragraph 37. In support of this application, CallWorks provides the following information:

1. **Proof of Facilities Readiness**

CallWorks, as an IPES provider, will be partnering with the CLEC Peerless Networks to provide PSTN interconnection. Peerless Networks is a CLEC in 43 of the 50 states and operates one of the largest interconnected networks in the U.S. CallWorks chose Peerless as our Interconnect Partner because of their ubiquity and their quality of service / commitment.

As per the LERG[[1]](#footnote-1), Peerless has local and “FGD” access interconnections to more than

240+ Tandem interconnections to all of the major ILECS, LECs, and other CLECs in

the USA. Below is an example of interconnections that Peerless has in Texas (alone) to

ATT (South Western Bell), Frontier, and United Telephone. Peerless also has filed the

appropriate FCC and LOCAL PUC Tariffs to enumerate any and all costs and charges of

interconnection.



1. **List of States in which CallWorks is planning to provide IPES /VoIP service.** CallWorks initially intends to provide service only in Texas (all major metro locations), but reserves the right to expand as business determines necessity.
2. **Conclusion**

CallWorks respectfully submits this additional information in support of the readiness of both CallWorks Corporation and Peerless Networks.

Respectfully submitted,

By: 

Ronald J Grob

CallWorks VP Network and Regulatory

1. LERG – Local Exchange Routing Guide – the TDM/PSTN routing bible. [↑](#footnote-ref-1)