

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

In the Matter of)
)
Flowroute Inc.) WC Docket No. 16-_____
)
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
the Commission’s Rules)

**APPLICATION OF FLOWROUTE INC. FOR AUTHORIZATION TO
OBTAIN NUMBERING RESOURCES**

Flowroute Inc. (“Flowroute”), 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*,¹ 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. Flowroute hereby requests the Commission grant it that authorization. In support of this application, Flowroute provides the following information.

¹ *Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd 6839 (2015).

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

(A) § 52.15(g)(3)(i)(A)

Name: Flowroute Inc.
Address: 1218 3rd Ave, Floor 6, Seattle, WA 98101
Telephone: (855) 356-9768
Qualified Personnel: Bayan Towfiq, Chief Executive Officer

(B) § 52.15(g)(3)(i)(B)

Flowroute 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. Flowroute 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)

Flowroute 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)

Flowroute hereby sets forth its capability to provide service within 60 days of the numbering resources activation date.

Flowroute, through various commercial partnerships and arrangements, currently manages several hundred-thousand numbers. Flowroute consequently has an OCN; appears in the LERG and NPAC and the IPES category; and has commercial agreements in place for routing to ILECs. In addition, Flowroute has developed porting tools to enable carriers to submit

porting requests and has accomplished bulk ports with no difficulty. As a result, Flowroute 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, Flowroute will be able to place nearly all numbers into service within a short timeframe, and all numbers will be placed into service within 60 days of activation. As further proof of its facilities readiness, Flowroute has attached to this application an agreement demonstrating that Flowroute obtains interconnection with the PSTN pursuant to a commercial arrangement that provides access to the PSTN. This agreement, submitted confidentially, is attached as Exhibit A.

(E) § 52.15(g)(3)(i)(E)

Flowroute 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 and 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)

Flowroute hereby certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, is led by a strong, experienced team of individuals with substantial managerial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services.

Flowroute has the capabilities to seamlessly port and place numbers into service and successfully route calls. Flowroute's lengthy experience with number porting enables it, along

with its carrier partners, to create routing arrangements that seamlessly deliver calls to numbers directly assigned to Flowroute.

Flowroute’s key management and technical personnel are listed below. None of the identified personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

Key Personnel: Bayan Towfiq, Chief Executive Officer
Eric Harber, Chief Operating Officer
Justin Grow, Director Carrier Operations
Jeff Heinen, Vice President of Engineering

(G) § 52.15(g)(3)(i)(G)

Flowroute 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), Flowroute 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. Flowroute 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, Flowroute respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

/s Ashley Ludlow

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August 15, 2016

Counsel to Flowroute, Inc.

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT A

AGREEMENT BETWEEN FLOWROUTE AND CARRIER PARTNER