July 20, 2017

VIA ECFS

Marlene Dortch

Secretary

Federal Communications Commission

445 12th St SW

Washington, DC 20554

RE: ShoreTel Sky dba M5 Networks LLC, Applicant to Obtain Number 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, ShoreTel hereby submits it’s application requesting authorization to obtain numbering resources.

For any question regarding this application please Michael Israely at 646-237-9783 or [misraely@shoretel.com](mailto:misraely@shoretel.com).

Respectfully,

Michael Israely

Michael Israely

Manager, Carrier Relations

ShoreTel Sky, dba M5 Networks LLC

www.shoretel.com

**Before the**

**FEDERAL COMMUNICATIONS COMMISSION**

**Washington, DC 20054**

**In the matter of:**

**ShoreTel Sky dba M5 Networks LLC, Applicant For )**

**Authorization to Obtain Numbering )**

**Resources Pursuant to Section )**

**52.15(g) of the Commission Rules )**

APPLICATION OF ShoreTel Sky dba M5 Networks LLC FOR AUTHORIZATION

TO OBTAIN NUMBERING RESOURCES

ShoreTel Sky dba M5 Networks LLC (hereinafter ShoreTel), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requests authorization to obtain numbering resources as described below.

Applicant requests the Commission grant it authorization as set forth in the Commission’s *Numbering and Policies for Modern Communications*, FCC 15-70 (June 22, 2015) to obtain numbering resources from the North American Numbering Administrator. In support of this application ShoreTel provides the following information:

1. INFORMATION REQUIRED BY SECTION 52.15(G)(3)(I)
2. § 52.15(G)(3)(i)(A)

Name: ShoreTel Sky dba M5 Networks LLC

Address: 1385 Broadway FL 7

New York, NY 10018

Telephone: (844) 746-7383

Person qualified to address issues relating to regulatory requirements, compliance with Commission rules, 911, and law enforcement.

Michael Israely

Manager, Carrier Relations

1385 Broadway FL 7

New York, NY 10018

(646) 237-9783

[misraely@shoretel.com](mailto:misraely@shoretel.com)

1. § 52.15(G)(3)(i)(B)

ShoreTel 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 authority delegated to the states, and industry guidelines, and practices regarding numbering as applicable to telecommunications carriers. ShoreTel has been in contact with NEUSTAR and will within 30 days have the necessary NPAC connections and completed NPACs training to ensure they are fully capable of managing the responsibilities of local number portability.

1. § 52.15(G)(3)(i)(C)

ShoreTel acknowledges it must file requests for numbers with the relevant

state commission(s) at least thirty (30) days before requesting numbers from the Numbering Administrators.

1. § 52.15(G)(3)(i)(D)

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

ShoreTel currently serves more than 6500 retail customers and is a provider of business communication solutions. The Company is engaged in the design, development, marketing and sale of business communication solutions. The Company is focused on the small and medium sized businesses seeking a unified communications (UC) solution allowing them to communicate anytime, anyplace and through any device they chose. The Company provides this to the market through two solutions: ShoreTel Connect, its UC solution, and Contact Center offering and ShoreTel Summit, its platform for developers and integrators. ShoreTel Connect delivers a featured UC solution and applications, such as mobility, collaboration and workgroups. ShoreTel Connect offers three different delivery models, including cloud, onsite and hybrid. Connect Cloud provides a hosted voice solution to its customers. Connect OnSite provides its customers the ability to own and operate their equipment. Connect Hybrid enables its customers to use both its cloud and onsite offerings. ShoreTel currently acquires their numbers from other carriers, but wishes to become an Interconnected VOIP Provider so they can order and manage their own numbers.

As proof of facilities readiness, ShoreTel has attached to this application (1) demonstration of established interconnect between ShoreTel and it’s carrier partner (Peerless Networks) providing PSTN connectivity for inbound calls to ShoreTel numbers and (2) an interconnection agreement between Peerless and the local exchange carrier. These documents are attached as Exhibits B-D to this application. ShoreTel has requested confidential treatment under the Commission’s rules for both Exhibits and has filed them separately.

1. § 52.15(G)(3)(i)(E)

ShoreTel certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 CFR §64.604©(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§52.17, 5232, its obligations to pay regulatory fees under 47 CFR §1.1154, and its 911 obligations under 47 CFR part 9. FCC 499 fees have been through M5 Networks, which is one of the subsidiary companies ShoreTel acquired in 2012. All fees are up to date as certified in Exhibit D.

1. § 52.15(G)(3)(i)(F)

ShoreTel hereby certifies that it has a financial, managerial, and technical expertise to provide reliable service. ShoreTel is comprised of an experienced Telecom and IP management team since established in 2007.

ShoreTel key management personnel are listed below. As certified in Exhibit D, 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: Don Joos, President and CEO

Mike Healy, Senior Vice President and Chief Financial Officer

Rick Parkinson, Chief Information Officer

Mark Roberts, Chief Marketing Officer

1. § 52.15(G)(3)(i)(G)

ShoreTel 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. See 21.U.S.C. § 862.

1. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(G)(3)(iv)

As required by Section 52.15(g)(3)(iv), ShoreTel will maintain the accuracy of all contact information and certifications in this application, and will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

1. CONCLUSION

Pursuant to Section 52.15(g)(3)(I) of the Commission’s Rules, ShoreTel respectfully requests the Commission grant this application for authorization to obtain number resources.

Respectfully,

Michael Israely

Michael Israely

Manager, Carrier Relations