

September 17, 2018

By Electronic Filing

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

Re: Interconnected VoIP Numbering Authorization Held by Flowroute Inc.;
WC Docket No. 16-265

Dear Ms. Dortch:

Flowroute Inc. (“Flowroute”), pursuant to Section 52.15(g)(3)(iv)(A) of the Commission’s rules,¹ respectfully notifies the Commission of changes to the information associated with its authorization to obtain numbering resources² resulting from the acquisition by West Corporation (“West”) of ultimate control of Flowroute and Flowroute’s wholly owned subsidiary Flowroute CLEC Inc. (“Flowroute CLEC” and together with Flowroute and West, the “Parties”).³ The Commission approved this transfer of control of Flowroute and Flowroute CLEC to West on August 10, 2018,⁴ and the transaction was consummated on August 15, 2018.

Flowroute currently holds authorization to obtain numbering resources from the Numbering Administrator as an interconnected Voice over Internet Protocol (“VoIP”) provider.⁵

¹ 47 C.F.R. § 52.15(g)(3)(iv)(A).

² *Notice of Interconnected VoIP Numbering Authorization Granted*, Public Notice, 31 FCC Rcd 11681 (2016) (“2016 Public Notice”); *see also* Interconnected VoIP Numbering Authorization Application Filed by Flowroute Inc. Pursuant to Section 52.15(g)(3) of the Commission’s Rules, WC Docket No. 16-265 (Aug. 15, 2016) (“Flowroute Application”).

³ On June 29, 2018, Flowroute and West submitted to the Commission a Joint Application for Consent to Transfer Control of International Authorization Pursuant to Section 214 of the Communications Act. *See* File No. ITC-T/C-20180629-00141.

⁴ *International Authorizations Granted*, Public Notice, Report No. TEL-01921, DA No. 18-855 (rel. Aug. 16, 2018).

⁵ *See* 2016 Public Notice.

Pursuant to the Commission's numbering policies and rules, the Parties submit this letter for informational purposes to ensure the accuracy of the Commission's records in connection with Flowroute's numbering authorization.

I. INFORMATION REQUIRED BY SECTION 52.15(g)

Section 52.15(g)(1). The Commission's rules require that an applicant for numbering resources include in its application any operating company numbers ("OCNs") its parent company may hold. As a result of the transaction, Flowroute is now a wholly owned, indirect subsidiary of West, and a direct subsidiary of West Telecom Services, LLC ("West Telecom"). The Parties hereby submit to the Commission the OCNs held by West Telecom, attached hereto as Attachment A.

Section 52.15(g)(3)(i)(F). The transaction resulted only in a change in the ownership of Flowroute, and did not affect the identity of Flowroute's key management and technical personnel, which are listed below and were set forth in the Flowroute Application.⁶

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

Section 52.15(g)(3)(i)(B). Flowroute acknowledges that the numbering authorization it holds is subject to compliance with applicable Commission numbering rules, numbering authority delegated to the states, and industry guidelines and practices. Flowroute certifies that it currently complies with such rules and will continue to do so under the ultimate control of West.

Section 52.15(g)(3)(iv). As required by Section 52.15(g)(3)(iv), the Parties will continue to maintain the accuracy of all contact information and certifications in the Flowroute Application and will file a correction with the Commission within 30 days of any future changes. Flowroute will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

⁶ See Flowroute Application.

Please date-stamp the extra copy of this letter that we provided and return it in the enclosed envelope. If you have any questions regarding this notification, please contact the undersigned.

Respectfully submitted,

/s/ Phillip Marchesiello

Phillip Marchesiello

Wilkinson Barker Knauer, LLP

1800 M Street, N.W., Suite 800N

Washington, D.C. 20036

Tel: (202) 783-4141

Fax: (202) 783-5851

PMarchesiello@wbklaw.com

Counsel to West Corporation and Flowroute Inc.

Enclosure

ATTACHMENT A

OPERATING COMPANY NUMBERS HELD BY WEST TELECOM SERVICES, LLC

Number	Name	State	Category	Overall OCN
116E	WEST TELECOM SERVICES, LLC - MA	MA	CLEC	9555
807C	WEST TELECOM SERVICES, LLC - AL	AL	CLEC	9555
808C	WEST TELECOM SERVICES, LLC - CA	CA	CLEC	9555
809C	WEST TELECOM SERVICES, LLC - CO	CO	CLEC	9555
810C	WEST TELECOM SERVICES, LLC - CT	CT	CLEC	9555
811C	WEST TELECOM SERVICES, LLC - DE	DE	CLEC	9555
812C	WEST TELECOM SERVICES, LLC - DC	DC	CLEC	9555
813C	WEST TELECOM SERVICES, LLC - FL	FL	CLEC	9555
814C	WEST TELECOM SERVICES, LLC - GA	GA	CLEC	9555
815C	WEST TELECOM SERVICES, LLC - ID	ID	CLEC	9555
816C	WEST TELECOM SERVICES, LLC - IL	IL	CLEC	9555
817C	WEST TELECOM SERVICES, LLC - IN	IN	CLEC	9555
818C	WEST TELECOM SERVICES, LLC - KS	KS	CLEC	9555
819C	WEST TELECOM SERVICES, LLC - LA	LA	CLEC	9555
820C	WEST TELECOM SERVICES, LLC - MD	MD	CLEC	9555
821C	WEST TELECOM SERVICES, LLC - MI	MI	CLEC	9555
822C	WEST TELECOM SERVICES, LLC - MN	MN	CLEC	9555
823C	WEST TELECOM SERVICES, LLC - MS	MS	CLEC	9555
824C	WEST TELECOM SERVICES, LLC - MO	MO	CLEC	9555
825C	WEST TELECOM SERVICES, LLC - MT	MT	CLEC	9555
826C	WEST TELECOM SERVICES, LLC - NE	NE	CLEC	9555
827C	WEST TELECOM SERVICES, LLC - NV	NV	CLEC	9555
828C	WEST TELECOM SERVICES, LLC - NH	NH	CLEC	9555
829C	WEST TELECOM SERVICES, LLC - NJ	NJ	CLEC	9555
830C	WEST TELECOM SERVICES, LLC - NM	NM	CLEC	9555
831C	WEST TELECOM SERVICES, LLC - NY	NY	CLEC	9555
832C	WEST TELECOM SERVICES, LLC - NC	NC	CLEC	9555
833C	WEST TELECOM SERVICES, LLC - OK	OK	CLEC	9555
834C	WEST TELECOM SERVICES, LLC - OR	OR	CLEC	9555
835C	WEST TELECOM SERVICES, LLC - PA	PA	CLEC	9555
836C	WEST TELECOM SERVICES, LLC - RI	RI	CLEC	9555
837C	WEST TELECOM SERVICES, LLC - SC	SC	CLEC	9555
838C	WEST TELECOM SERVICES, LLC - SD	SD	CLEC	9555
839C	WEST TELECOM SERVICES, LLC - VT	VT	CLEC	9555
840C	WEST TELECOM SERVICES, LLC - VA	VA	CLEC	9555
841C	WEST TELECOM SERVICES, LLC - WA	WA	CLEC	9555
842C	WEST TELECOM SERVICES, LLC - WV	WV	CLEC	9555

843C	WEST TELECOM SERVICES, LLC - WI	WI	CLEC	9555
844C	WEST TELECOM SERVICES, LLC - WY	WY	CLEC	9555
845C	WEST TELECOM SERVICES, LLC - TN	TN	CLEC	9555
860C	WEST TELECOM SERVICES, LLC - IA	IA	CLEC	9555
861C	WEST TELECOM SERVICES, LLC - KY	KY	CLEC	9555
890G	WEST TELECOM SERVICES, LLC - AZ	AZ	CLEC	9555
891G	WEST TELECOM SERVICES, LLC - ND	ND	CLEC	9555
893C	KMC DATA LLC - TX ⁷	TX	CLEC	9555
9555	WEST TELECOM SERVICES, LLC	GA	CLEC	9555
9556	WEST TELECOM SERVICES, LLC - AR	AR	CLEC	9555
9557	WEST TELECOM SERVICES, LLC - OH	OH	CLEC	9555
9558	WEST TELECOM SERVICES, LLC - TX	TX	CLEC	9555

⁷ KMC Data, LLC was acquired by HyperCube Telecom, LLC in 2005 and West Telecom Services, LLC in 2012.