



August 28, 2012

Michael C. Ladam
Assistant Director of Telecommunications
New Hampshire Public Utilities Commission
21 S. Fruit St.
Suite 10
Concord, NH 03301-2429

RE: DOCKET DT 12-260: 365 Wireless, LLC CLEC Certification

Dear Mr. Ladam:

We received your letter requesting additional information regarding 365 Wireless, LLC's Application to provide local exchange and interexchange telecommunications services in the State of New Hampshire and are pleased to provide this information.

While the Company does hold an FCC wireless license, the Company proposes to offer local exchange and interexchange telecommunications services via traditional terrestrial telecommunications facilities and has no intention, and seeks no authority, to provide such services via any wireless technology or infrastructure.

As of the date of the filing of our New Hampshire Application, 365 Wireless, LLC has been granted CLEC authority as a facilities-based carrier in eighteen (18) states. The Company is unaware of any regulations that would preclude the holder of an FCC wireless license from also operating as a provider of local exchange and interexchange telecommunications services.

We have attached a document that describes Applicant's scope of business operations, network facilities, switch-type, and provisioning methods. I trust that this information is responsive to your request and clearly explains our request for consideration and approval as a traditional competitive local exchange carrier.

If you should have any additional questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Cash', written over a horizontal line.

Tony Cash
General Counsel

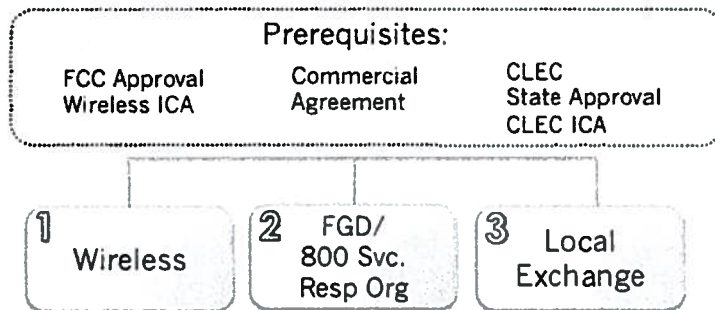
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EXECUTIVE SUMMARY OF APPLICANT'S BUSINESS OPERATIONS

365 Wireless, LLC ("365" or "Company" or "Applicant") was organized under the laws of the State of Georgia on March 29, 2011. Although the Company's name contains the word "Wireless", 365 intends to operate in three primary Lines of Business (only one which is Wireless) as described in Chart 1, below. The Chart describes both the types of services intended to be offered as well as the prerequisites for operating each of the Lines of Business.

365 Wireless, LLC Lines of Business



- Carrier-to-Carrier
- Local Community
- Large Enterprise
- Call Centers
- Conferencing (transport)
- Carrier-to-Carrier
- IXC (access)
- Large Enterprise
- Special Access
- Private Line
- Rings
- Data



"Box 1" Services (Wireless). The Company holds an FCC wireless license which gives 365 authority to operate as a wireless carrier (Box 1). The services in this product category include wireless services both to local communities as well as to other wireless carriers.

"Box 2" Services (FGD/800 Svc./Resp Org). To enable the Company to provide Feature Group "D" (FGD) services (Box 2), the Company engages in commercial contracts with other carriers. These contracts guide the terms and conditions for the carrier-to-carrier transport of 8XX traffic. The Company also intends to provide "Resp Org" services in association with the transport of carrier-to-carrier toll-free traffic.

"Box 3" Services (Local Exchange). In order to provide Local Exchange services, the Company must obtain State approval from the Commission, which is the purpose of the Application the Company recently submitted. As of the time of filing our Application, the Company is an approved provider of Local Exchange Services in the States of New York, Florida, Texas, Washington, Massachusetts, Indiana, Oregon, Georgia, Wisconsin, North Dakota, Nevada, New Jersey, Nebraska, Illinois, New Mexico, South Dakota, Ohio, and Montana.

Obligations of Company. Because 365 operates in three Lines of Business, the Company must obtain the proper Governmental operating authority (or Commercial Agreement, or both), where appropriate, prior to offering services to Customers. Additionally, the Company is guided by Interconnection Agreements in portions of its business and these agreements prescribe the types of traffic that can be routed over specific facilities and also provides the terms, conditions, requirements, and obligations

of both the Applicant and other carriers which are parties to such agreements. Company adheres to all such requirements and obligations.

The purpose of 365 Wireless's Application to provide local exchange and interexchange telecommunications services within the State of New Hampshire is to obtain the authority required to offer the services described in "Box 3" on page 1. Applicant intends to provide such services via terrestrial telecommunications facilities and has no intention, and seeks no authority, to provide local exchange telecommunications services via any wireless technology or infrastructure.

Network Description. Applicant is a facilities-based and resale local exchange carrier providing switched and dedicated local exchange telecommunications services to Businesses only. Applicant proposes offering these services on a facilities basis in the State of New Hampshire.

Where facilities-based service is provisioned, 365 Wireless will use its current and state-of-the-art Class 4/5 Voice over Internet Protocol (VoIP) softswitch capable of handling thousands of end customers. The core softswitch is located in the 365 Wireless Atlanta colocation environment (Atlanta NAP). Connectivity to all locations will be provided through an extensive SONET-fiber backbone.

Local connectivity to the LEC tandems and end-offices (to provide "local access") will be provided via LEC trunking from the LEC switch to the 365 Wireless Point of Interface (POI) locations in each LATA. Depending upon size and traffic volume, 365 Wireless, LLC may deploy local edge-router/media gateway devices locally

in those markets, or ultimately deploy a local softswitch in large markets. In smaller markets, a physical POI interface location will be deployed providing a logical and physical interface to the core VoIP softswitch.

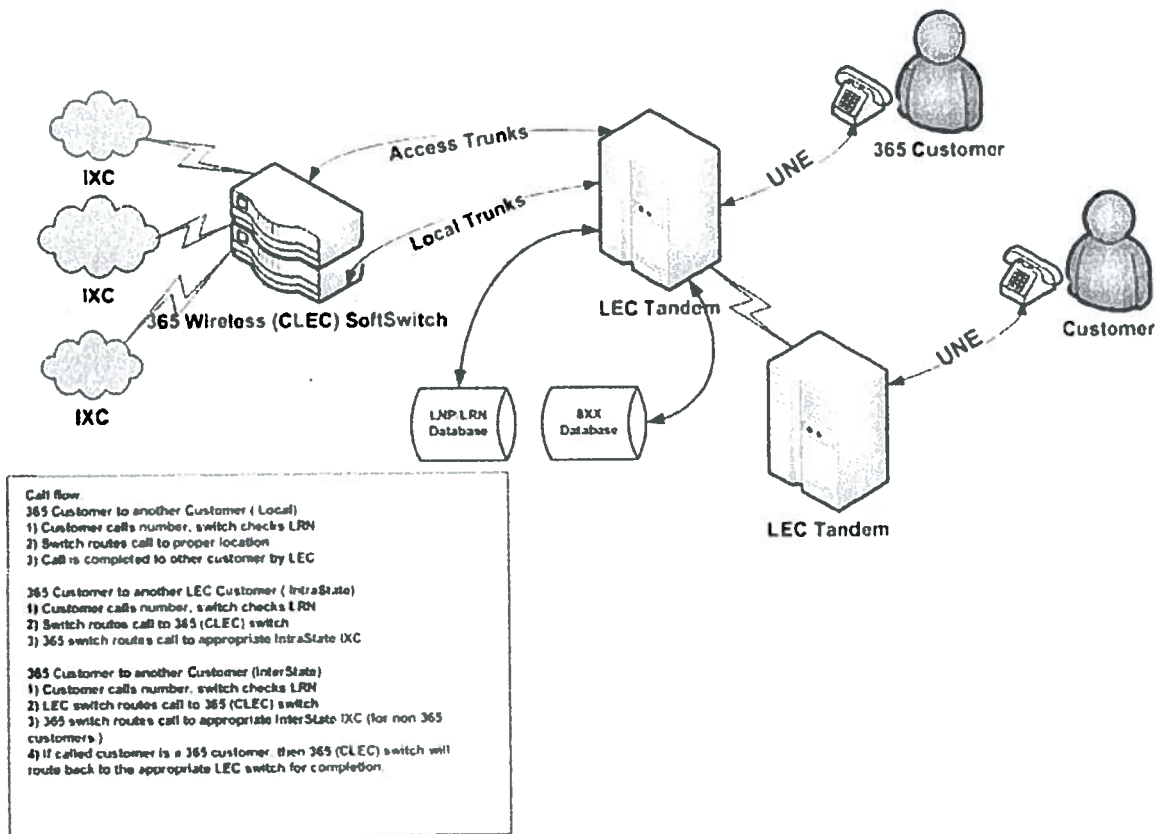
Facilities-based local access may be provided to a Business customer through the use of several methods:

- a) UNE, UNEP, EEL loops may be purchased from the LEC to provide the "last mile" loops to each customer location.
- b) PRI loops may be purchased from each LEC to provide higher capacity loops to PBXs, E-Key systems, VoIP PBXs, etc. at a customer's location.
- c) DS1 loops may be purchased from the LEC to each customer location for VoIP devices (Data, Voice, Video, etc.) or for "non-PRI" compliant devices.
- d) All LEC loops will be provisioned, as per the LEC Interconnection Agreement (ICA) and as per State Commission guidelines.
- e) Company will physically connect to all applicable LEC tandems and end-offices as required to provide the necessary routing and call volume handling as per Local Exchange Routing Guide (LERG) guidance.

365 Wireless may, at its discretion, choose to deploy Feature Group "D" (FGD) trunking in selected LATAs to provide 8XX Toll-Free inbound traffic to a select group of its customers (described earlier as "Box 2 Services".) In addition, 365 Wireless may use FGD trunking to provide IXC access to Interstate and IntraState call terminations (egress from the 365 Wireless core switch network).

Applicant's Network is depicted below.

365 Wireless, LLC (CLEC) Network Diagram Local & Access Switching



Summary of Applicant's Business Plan. Consistent with Phase One of its business plan, the Company began seeking certification as a provider of competitive local exchange services and is currently authorized to provide such services in the eighteen U.S. States previously enumerated.

Now in Phase Two, 365 is provisioning the facilities necessary to begin offering services to customers in those states and is also working concomitantly to

become certified throughout the United States. At the time of this filing, the Company has Applications pending in six states (in addition to the 18 states where approval has been granted) and has had no such Applications dismissed or denied. The operations proposed by the Applicant are economically feasible and Applicant is financially qualified to provide the local exchange and interexchange services requested in this Application.

Summary. Applicant petitions the Commission to approve its request for authority to provide local exchange and interexchange services. Applicant proposes that approval of its petition is consistent with the desires of the Commission and is in the public interest.