

# Potomac LAW GROUP

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December 8, 2020

PUBLIC VERSION –  
CONFIDENTIAL INFORMATION EXCLUDED

VIA ECFS

Marlene Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: Application of PanTerra Networks, Inc. For Authorization to Obtain Numbering Resources, Pursuant to Section 52.15(g), Docket No. 20-\_\_\_\_\_

Dear Ms. Dortch:

Pursuant to §52.15(g)(3)(i) of the Commission's Rules,<sup>1</sup> PanTerra Networks, Inc. ("PanTerra") files its Application for Authorization to Obtain Numbering Resources. Please note, this Application contains confidential material, the disclosure of which would competitively harm the Company. Accordingly, PanTerra requests this material be filed under seal, pursuant to §0.459 of the Commission's Rules.<sup>2</sup> In support of this request, PanTerra submits the following:

*1. Identification of the information for which confidential treatment is sought.*

PanTerra seeks confidential treatment of **Exhibits A and B** to its Application, and specific references to these exhibits found in the body of its Application.

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<sup>1</sup> 47 C.F.R. § 52.15(g).

<sup>2</sup> 47 C.F.R. § 0.459.

2. *Description of the circumstances giving rise to the submission.*

As part of its Application, PanTerra is including the agreements between its carrier partners as proof of its facilities readiness as required by §52.15(g)(3)(i)(D) of the Commission's Rules, and copies of a number of the carriers' interconnection agreements with incumbent carriers.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The information for which PanTerra seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors. The Exhibits to this Application describes the agreements between PanTerra and its carrier partners and contains proprietary commercial information concerning PanTerra's network, customers, financing, and services.

4. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*

The Exhibits contain information relating to commercial matters which can be used by other interconnected Voice over Internet Protocol ("VoIP") providers to compromise PanTerra's position in the highly competitive interconnected VoIP sector. Accordingly, release of this information would result in substantial competitive harm to PanTerra.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Competitors could use PanTerra's proprietary commercial and operational information to PanTerra's detriment as they would gain access to sensitive information concerning PanTerra's commercial agreements, as well as information as to how PanTerra provides its services. This information is not typically disclosed publicly.

6. *Identification of any measures taken to prevent unauthorized disclosure, or if the information has been disclosed previously.*

Neither PanTerra nor its carrier-partners have distributed the information to the public or to any third party.

7. *Justification of the period during which PanTerra asserts that material should not be available for public disclosure.*

PanTerra requests that the Exhibits be treated as confidential for a minimum period of ten years. This period is necessary due to the nature of the proprietary information in the Exhibits of the Application.

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Concurrent with this filing in ECFS, the confidential version of this Application has been filed with the Secretary's Bureau via overnight courier.

Thank you for your assistance in this matter and please do not hesitate to contact me at (202) 792-6422, or [kmarshall@potomacclaw.com](mailto:kmarshall@potomacclaw.com) if you have any questions or concerns.

Respectfully submitted,

A handwritten signature in blue ink, reading "Katherine E. Barker Marshall". The signature is written in a cursive, flowing style.

Katherine Barker Marshall, Counsel to PanTerra Networks, Inc.

cc: Robert Perez Mainor, PanTerra Networks, Inc.