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May 28, 2020

PUBLIC VERSION –
CONFIDENTIAL INFORMATION EXCLUDED

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Application of Noble Systems Communications LLC, 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,¹ Noble Systems Communications LLC (“Noble”) 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, Noble requests this material be filed under seal, pursuant to §0.459 of the Commission’s Rules.² In support of this request, Noble submits the following:

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

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

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

¹ 47 C.F.R. § 52.15(g).

² 47 C.F.R. § 0.459.

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As part of its Application, Noble is including the agreement between its carrier partner 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 carrier's 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 Noble seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors." The Exhibits to this Application describes the agreement between Noble and its carrier partner and contains proprietary commercial information concerning Noble'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 Noble's position in the highly competitive interconnected VoIP sector. Accordingly, release of this information would result in substantial competitive harm to Noble.

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

Competitors could use Noble's proprietary commercial and operational information to Noble's detriment as they would gain access to sensitive information concerning Noble's commercial agreements, as well as information as to how Noble 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 Noble nor its carrier-partner have distributed the information to the public or to any third party.

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

Noble 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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Two copies of this filing with the confidential information included are being submitted concurrently 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@potomaclaw.com if you have any questions or concerns.

Respectfully submitted,

A handwritten signature in blue ink that reads "Katherine E. Barker Marshall". The signature is fluid and cursive, with "Katherine" and "Barker" on the first line and "Marshall" on the second line.

Katherine Barker Marshall, Counsel to Noble Systems Communications LLC

cc: John B. Simpson II, Noble Systems Communications LLC