



October 20, 2017

VIA HAND DELIVERY

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

**REQUEST FOR
CONFIDENTIAL TREATMENT**

Re: *GetGo Communications LLC, Application for Authorization to Obtain Numbering Resources & Request for Confidential Treatment, WC Docket No. 17-_____*

Dear Ms. Dortch:

GetGo Communications LLC (“GetGo Communications”), hereby encloses for filing its Application to Obtain Numbering Resources (“Application”) and corresponding Attachment A, an interconnection agreement between GetGo’s carrier partner and a local exchange carrier (“Interconnection Agreement”). The Application and Interconnection Agreement are sent to you for filing pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules.

GetGo Communications respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457 and 0.459, the Commission withhold from public inspection and accord confidential treatment to the Interconnection Agreement. This document contains trade secrets and commercial, technical and financial information that fall within Exemption 4 of the Freedom of Information Act (“FOIA”).¹

Exemption 4 of FOIA provides that the public disclosure requirement of the statute “does not apply to matters that are . . . (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential.”² GetGo Communications is voluntarily providing this trade secret and commercial and financial information “of a kind that would not customarily be released to the public”; therefore, this information is “confidential” under Exemption 4 of FOIA.³ Moreover, GetGo Communications would suffer substantial competitive harm if the Interconnection Agreement were disclosed.⁴

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules,⁵ GetGo Communications hereby states as follows:

¹ 5 U.S.C. § 552(b)(4).

² *Id.*

³ See *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

⁴ See *National Parks and Conservation Ass’n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

⁵ 47 C.F.R. § 0.459(b).

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT⁶

GetGo Communications seeks confidential treatment of Attachment A, an interconnection agreement between GetGo's carrier partner and a local exchange carrier ("Interconnection Agreement").

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION⁷

The Interconnection Agreement is being submitted to the Commission in conformity with the referenced docket number.

3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED⁸

The information for which GetGo Communications seeks confidential treatment contains sensitive commercial, financial, and technical information "which would customarily be guarded from competitors."⁹ The Interconnection Agreement contains trade secrets and technical information relating to the manner in which GetGo Communications and its carrier partner conduct network operations.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERN'S A SERVICE THAT IS SUBJECT TO COMPETITION¹⁰

The Interconnection Agreement contains detailed information relating to operational matters that could be used by competitors to the disadvantage of GetGo Communications. Disclosure of GetGo Communications' confidential information would cause substantial competitive harm.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM¹¹

Competitors could use the information in the Interconnection Agreement to GetGo Communications' detriment.

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE¹²

⁶ 47 C.F.R. § 0.459(b)(1).

⁷ 47 C.F.R. § 0.459(b)(2).

⁸ 47 C.F.R. § 0.459(b)(3).

⁹ 47 C.F.R. § 0.457.

¹⁰ 47 C.F.R. § 0.459(b)(4).

¹¹ 47 C.F.R. § 0.459(b)(5).

¹² 47 C.F.R. § 0.459(b)(6).

GetGo Communications has made the substance of the Interconnection Agreement known only to those employees who have a need to know the subject matter and those employees are aware of the confidential and sensitive nature of the information. The Interconnection Agreement has not been disclosed by GetGo Communications to any non-signatories outside GetGo Communications.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES¹³

GetGo Communications has not previously disclosed the Interconnection Agreement to the public.

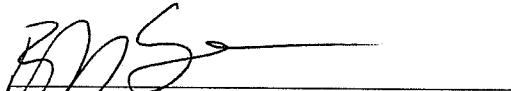
8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE¹⁴

GetGo Communications requests that the Interconnection Agreement be treated as confidential for a period of ten years. This period is necessary due to the sensitive nature of the information in the Interconnection Agreement.

9. OTHER INFORMATION THAT GETGO COMMUNICATIONS BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED¹⁵

The disclosure of the names of GetGo Communications' carrier partner and interconnecting local exchange carrier could be used to the competitive detriment of GetGo Communications.

Respectfully submitted,



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¹³ 47 C.F.R. § 0.459(b)(7).

¹⁴ 47 C.F.R. § 0.459(b)(8).

¹⁵ 47 C.F.R. § 0.459(b)(9).

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
GetGo Communications LLC, Applicant) WC Docket No. 17-_____
)
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
the Commission's Rules)

**APPLICATION OF GETGO COMMUNICATIONS LLC
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

GetGo Communications LLC (“GetGo”) files this application with the Federal Communications Commission (the “Commission”) for authorization to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (the “Numbering Administrators”) pursuant to Commission rule section 52.15 (g)(3).¹

As set forth in the Commission’s Numbering Order,² an interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon showing that it is authorized to provide service in the area for which the numbering resources are requested. Such authorization may be obtained upon an application to the Commission containing the information in Sections 52.15(g)(3)(i)(A)-(F) of the Commission’s Rules. GetGo hereby requests the Commission grant it the authorization.

GetGo provides the following information in support of its application:

¹ 47 C.F.R. § 52.15(g)(3).

² *Numbering Policies for Modern Communications*, 30 FCC Rcd. 6839 (2015).

I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)

a) §52.15(g)(3)(i)(A)

Name: GetGo Communications LLC
Address: 10 Exchange Place, Suite 1710
Jersey City, NJ 07302
Telephone: (855) 673-2532
Qualified Personnel: Kari Zeni, Associate General Counsel
Email: kari.zeni@logmein.com

b) §52.15(g)(3)(i)(B)

GetGo hereby 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 rules as well as to the numbering authority is subject to compliance with industry guidelines and practices regarding numbering, just as to telecommunications carriers.

c) §52.15(g)(3)(i)(C)

GetGo hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators.

d) §52.15(g)(3)(i)(D)

GetGo hereby sets forth its capability to provide service within 60 days of the numbering activation date. GetGo has agreements in place with carrier partners who in turn have interconnection agreements in effect with the relevant local exchange carriers. GetGo has been in operation as a CLEC for 4 years and, as a result, has internal operations in place to support number requests and routing as supported by its AOCN. GetGo has a full staff for porting.

As proof of its facilities readiness, GetGo has attached to this application an interconnection agreement between GetGo's carrier partner and a local exchange carrier. This

document is Exhibit A to this application. GetGo has requested confidential treatment under the Commission's rules for this Exhibit and has filed it separately.

e) §52.15(g)(3)(i)(E)

GetGo certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H; its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii); its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17 and 52.32; its obligations to pay regulatory fees under 47 CFR § 1.1154; and its 911 obligations under 47 CFR part 9.

f) §52.15(g)(3)(i)(F)

GetGo certifies that it possesses the financial, managerial, and technical expertise to provide reliable service. GetGo's key management and technical personnel are:

Steven Kline, Telecom Vendor Manager, Voice Operations. (805)60-7984.
Steven.Kline@logmein.com;

Mark Boyles, Director, Voice and Real Time Operations. (201) 386-2213.
Mark.Boyles@logmein.com.

GetGo states that none of the identified personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

g) §52.15(g)(3)(i)(G)

GetGo hereby certifies that no party to this application is subject to a denial of Federal benefits to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)

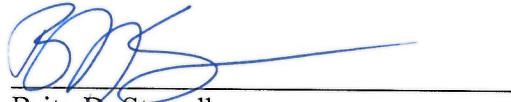
As required by Section 52.15(g)(3)(iv), GetGo will maintain the accuracy of all contact information and certifications in the application, and will file a correction with the Commission

and each applicable state within 30 days of any changes. GetGo will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

III. CONCLUSION

Pursuant to Section 52.15(g)(3)(i) of the Commissions' Rules, GetGo respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,



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EXHIBIT A

INTERCONNECTION AGREEMENT

(submitted pursuant to Confidentiality Request under 47 C.F.R. §§ 0.457 and 0.459)