

FosterDanowsky LLP

Jason A. Danowsky
Attorney at Law

904 West Ave, Ste. 107
Austin, Texas 78701
(512) 708-8700
Fax (512) 697-0058
www.fosterdanowsky.com

Writer's Email:
jdanowsky@fosterdanowsky.com

May 6, 2020

VIA FIRST CLASS MAIL

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

RE: Request for Confidential Treatment to Application of TRUSTID, Inc. for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of the Commission's Rules

Dear Ms. Dortch,

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, TRUSTID, Inc. ("TRUSTID") hereby submits its application requesting authorization to obtain numbering resources.

TRUSTID 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, Exhibit A to this application in its entirety as confidential because the documents contain trade secrets and commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). The information in Exhibit A is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. TRUSTID respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibit A is accordingly marked with "Confidential and Proprietary – Filed Under Seal Pursuant to 47 C.F.R. §0.459."

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, TRUSTID hereby states as follows:

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT PURSUANT TO 47 CFR § 0.459(b)(1).

TRUSTID seeks confidential treatment of Confidential Exhibit A in its entirety.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION PURSUANT TO 47 CFR § 0.459(b)(2).

TRUSTID is submitting the confidential agreements between it and its LEC partner as proof of TRUSTID's facilities readiness as required by Section 52.15(g)(3)(i)(D) of the Commission's rules.

3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED PURSUANT TO 47 CFR § 0.459(b)(3).

The information for which TRUSTID seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors" as defined in 47 CFR § 0.457(d)(2). Confidential Exhibit A consists of commercial agreements between TRUSTID and its LEC partner of which contain proprietary information concerning TRUSTID's network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION PURSUANT TO 47 CFR § 0.459(b)(4).

Confidential Exhibit A contains information relating to commercial matters that could be used by competitors to TRUSTID's disadvantage. TRUSTID has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by TRUSTID could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to TRUSTID.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM PURSUANT TO 47 CFR § 0.459(b)(5).

Competitors could use TRUSTID's proprietary and commercial information to its detriment as they would gain access to sensitive data about how TRUSTID provides services as well as about TRUSTID's commercial agreements with others in the market that are not normally disclosed to the public.

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(6).

TRUSTID has not distributed the information in Confidential Exhibit A to the public or any parties within TRUSTID or outside TRUSTID except on a need-to-know basis.

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

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THE INFORMATION TO THIRD PARTIES PURSUANT TO 47 CFR § 0.459(b)(7).

TRUSTID has not previously disclosed the information in Confidential Exhibit A.

8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(8).

TRUSTID requests that Confidential Exhibit A be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information in Confidential Exhibit A.

9. OTHER INFORMATION THAT TRUSTID BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED PURSUANT TO 47 CFR § 0.459(b)(9).

The information concerns TRUSTID's proprietary network, related to current and planned operations, and as such, is commercially sensitive.

If you should have any questions or concerns, please feel free to contact me at your convenience.

Respectfully submitted,

By: 

FosterDanowsky, LLP

Jason Danowsky

Texas Bar No. 24092318

jdanowsky@fosterdanowsky.com

Mark Foster

Texas Bar No. 07293850

mfoster@fosterdanowsky.com

904 West Ave., Ste. 107

Austin, TX 78701

(512) 708-8700

(512) 697-0058/fax

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

In the Matter of TRUSTID, Inc.) WC Docket No. 20- _____
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

APPLICATION OF TRUSTID, Inc.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES

TRUSTID, Inc. (“TRUSTID”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requests authorization to obtain numbering as described below. Under the Commission’s *Numbering Order*,¹ an interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon a 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 detailed in Section 52.15 (g)(3)(i)(A)-(G) of the Commission’s Rules. TRUSTID hereby requests the Commission grant it that authorization. In support of this application, TRUSTID provides the following information:

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

A. § 52.15(g)(3)(i)(A)

Name: TRUSTID, Inc.
Address: 21575 Ridgetop Circle, Sterling VA 20166
Telephone: 703-889-6973

Contact for Regulatory Requirements, Compliance, 911 and Law Enforcement:

Name: Kevin Hughes; Executive Vice President & General Counsel of Neustar, Inc.
Address: 21575 Ridgetop Circle
City: Sterling
State: Virginia
ZIP Code: 20166
Telephone: 703-889-6973
Fax: N/A
Email: kevin.hughes@team.neustar

¹ *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015).

B. § 52.15(g)(3)(i)(B)

TRUSTID 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 delegated to the states. The Company hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers. TRUSTID intends to offer services immediately in Colorado and Texas, but seeks authority to access numbering resources throughout the United States.

C. § 52.15(g)(3)(i)(C)

TRUSTID 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)

TRUSTID hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. TRUSTID is a subsidiary of Neustar, Inc., an established telecommunications company. The Company was founded by an experienced telecommunications professional and has an agreement in place with CenturyLink, an Incumbent Local Exchange Carrier, to serve as TRUSTID's underlying carrier. TRUSTID intends to offer services immediately in Colorado and Texas, but seeks authority to access numbering resources throughout the United States. The agreement demonstrating this and capability is attached to this application as Confidential Exhibit A.

E. § 52.15(g)(3)(i)(E)

TRUSTID hereby certifies that it will comply 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)

The Company certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, led by a strong, experienced management team with substantial managerial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services. TRUSTID's key management and technical personnel are identified in attached Exhibit B. None of the identified personnel are being or have 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)

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

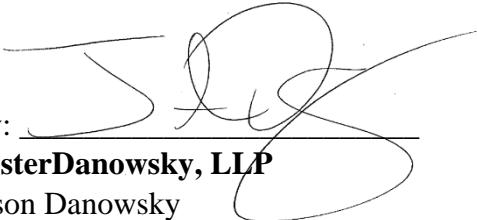
II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)

As required by Section 52.15(g)(3)(iv), TRUSTID will maintain the accuracy of all contact information and certifications in this application and will file a correction with the Commission and each applicable state within 30 days of any changes. TRUSTID 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 Commission's Rules, TRUSTID, Inc. respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

By: 
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Jason Danowsky
Texas Bar No. 24092318
jdanowsky@fosterdanowsky.com
Mark Foster
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Exhibit B

Key Managerial and Technical Personnel

PATRICK COX

Patrick Cox is the Senior Vice President and General Manager Product Management, TRUSTID at Neustar, Inc.

From 2007 - 2018, Patrick was the chairman and CEO of TRUSTID, Inc., a registered telecommunications carrier in the State of Oregon. TRUSTID authenticates incoming calls for many of the largest financial services firms in the country. During this period, TRUSTID audited incoming calls in real time to ensure that the claimed ANI is in fact calling the financial institution.

Drawing on a strong business background and deep technical expertise in telecommunications and authentication technology, TRUSTID helps customer contact centers of financial institutions and other large enterprises authenticate their callers more accurately and efficiently.

Before establishing TRUSTID, Cox launched and led two other companies in the authentication, identity and telecommunications industries. The first, Metro One Telecommunications, a licensed CLEC in many states, and Cox led the company as CEO from its start-up in 1989 to its initial public offering in 1998. The company became a billion-dollar market capitalized business which was publicly traded on the NASDAQ stock exchange. At that time, Metro One was an agent of record for most of the country's wireless carriers (including AT&T Wireless, Verizon, Sprint, Southwestern Bell, Ameritech, US West/Quest, and Macaw Cellular). TRUSTED handled those companies' 411 and 5551212 traffic.

The second, Qsent, was a provider of telecommunications contact identity services for the financial services industry; it was successfully sold to a leading global credit bureau. Cox served as Qsent's Chairman and CEO from its inception in 1998 through its sale to TransUnion in 2006, at which point he joined TransUnion as an executive vice president. The company housed MCI's 411 database, and provided telecommunications services as a CLEC in Oregon.

Cox holds thirty (300) patents in telecommunications and authentication technology and has been certified as a Class 1 telecommunications engineer by the National Association of Radio and Telecommunicatioins Engineers for approximately twenty-five (25) years.

He is an alumnus of Stanford University's Executive Institute for the Management of High-Technology Companies.

Cox is a member of the following Non-Profit Boards, Organizations, and Committees:

- Young Presidents Organization (YPO - YPOg), a current member and past Chapter Chair
- National Assoc. Of Radio And Telecommunications Engineers, Class 1 Engineer

Patrick Cox
General Manager, TRUSTID



Pat is a Neustar vice president and general manager of TRUSTID.

With 27 patents in telecommunication and authentication technology to his name, Patrick Cox has made an indelible mark on the industry.

Before founding TRUSTID, Inc. in 2007, he launched and led two other companies in the authentication and telecommunications industries. The first became a billion dollar publicly traded business. The second was successfully sold to a leading financial services firm.

Pat approaches every day as an opportunity to learn. He thrives on the constant challenge of his work and feels lucky to collaborate with some of the brightest minds in the industry.

Education

Certified Class 1 NARTE Telecommunications Engineer

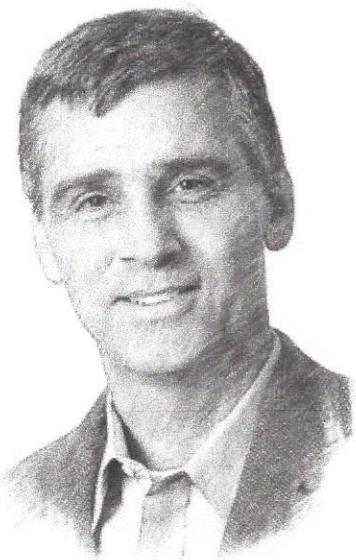
Executive Institute for the Management of High Technology Companies - Stanford University

Memberships

World Presidents Organization (WPO)

Young Presidents Organization (YPO) - Past chapter chair

Rich Greene
VP, Technology



For over 20 years, Rich has led technology divisions for large and small companies in financial services, big data, authentication and telecommunications industries.

In the six years prior to TRUSTID, Rich was the Chief Technology Officer of a multi-billion dollar global payments company. He is an accomplished leader in building architectures and teams that securely process billions of transactions.

Education

Bachelors of Science, Computer Science and Math - California State University-Long Beach

Brent Godfrey
Sales



Brent brings 15 years of sales experience encompassing telecommunications, fraud detection, investment banking and call center expertise.

Prior to joining TRUSTID, Brent held senior sales positions with several leading companies, including Memento Security (now FIS) and Adeptra (now FICO). He spent over 10 years at The Kessler Group as Vice President in the investment banking unit developing credit card portfolio acquisitions. He also led a call center consulting team that coordinated partnerships with credit card brands.

Education

Bachelor's degree in Business Administration - Kent State University.

Memberships

Brent actively serves on several boards in Boston, his hometown.

Lance Hood
Marketing



Lance is responsible for marketing at TRUSTID. He has over 20 years of marketing experience spanning technology, healthcare and security markets.

Before joining TRUSTID he led marketing for GetInsured and Array Health. Prior to this, he led product marketing at EDI leader Edifecs and held multiple executive positions at security vendor Epok.

Education

Bachelor of Business Administration in Marketing - University of Puget Sound

Master of Business Administration in Finance - Foster School of Business, University of Washington

Will Finley

Professional Services



A technology operations professional, Will brings over 20 years of experience to the TRUSTID team leading IT initiatives.

Prior to TRUSTID, Will led numerous initiatives in the Financial Services sector implementing mobile banking solutions at Clairmail (now Fiserv) as well as operational roles at Capital One and Compaq Computer (now HP).

Education

BS degree in Marine Engineering - U.S. Coast Guard Academy

Master Business Administration - J.L. Kellogg Graduate School, Northwestern University

Masters of Engineering Management - Robert R. McCormick School of Engineering, Northwestern University

Dan Stone
Software Engineering



For over 15 years, Dan has excelled in robust systems design and operation, high-volume transaction processing and engineering management. At TRUSTID, he focuses on delivering world-class software solutions for the call center industry.

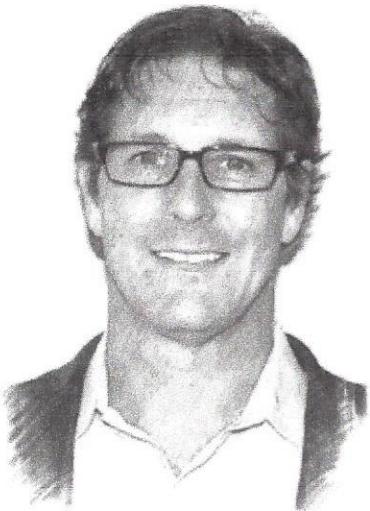
Prior to TRUSTID, Dan led development in the research arm at the Northwest Evaluation Association (NWEA) contributing to the latest implementation of NWEA's computer-adaptive testing platform. Earlier, he led software teams in the development of Contact Identity services at a leading credit bureau.

A Certified ScrumMaster, Dan employs a range of agile methodologies to ensure predictive processes and software.

Education

Bachelor's degree in Communications - University of California, San Diego

Chris O'Leary
Channel Management



Chris is responsible for channel management at TRUSTID. He brings three decades of business development and sales expertise across the payment services, financial institutions, and investment banking industries.

Prior to joining TRUSTID, Chris held senior sales and sales management positions with Card Services for Credit Unions, Brookwood Capital, The Kessler Group and First Data Resources. His principal focus has been on bringing growth, profitability, and risk mitigation strategies to financial institutions' payments programs.

Education

Bachelor of Business Administration - North Adams State College

Shreyas Saitawdekar

Architecture



An information technology professional and evangelist, Shreyas offers over 17 years of experience in enterprise-grade software architecture development and IT management.

Prior to joining TRUSTID, Shreyas was the Principal Architect at a leading global credit bureau. There, he invented Massive Data Linking, which facilitates searches of terabytes of data with cloud-based distributed computing.

Education

Master's degree in Electronics Engineering - Shivaji University, India

Bachelor's degree in Electronics Engineering - University of Bombay, India