

Compliance Solutions, Inc.
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April 27, 2021
Via ECFS Filing
REDACTED FOR PUBLIC INSPECTION

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

RE: Request for Confidential Treatment to Application of Affiliated Technology Solutions, LLC. 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, Affiliated Technology Solutions, LLC.; here forward known as ("ATS") hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

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

Exhibit B 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, ATS hereby states as follows:

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

ATS seeks confidential treatment of Exhibit B in its entirety.

Affiliated Technology Solutions, LLC.

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2. CIRCUMSTANCES CAUSING THE SUBMISSION PURSUANT TO 47 CFR § 0.459(b)(2).

ATS is submitting confidential agreements between ATS's interconnected VoIP carrier partner and AT&T (Exhibit B) as proof of ATS'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 ATS 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 B consists of commercial agreements between ATS's interconnected VoIP partner and AT&T to provide PSTN originating and terminating services, all of which contain proprietary information concerning ATS'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 B contains information relating to commercial matters that could be used by competitors to ATS's disadvantage. ATS has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by ATS could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to ATS.

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

Affiliated Technology Solutions, LLC.

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

ATS has not distributed the information in Confidential Exhibit B to the public or any parties within ATS or outside ATS except pursuant to appropriate confidentiality agreements.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES PURSUANT TO 47 CFR § 0.459(b)(7).

ATS deems the information in Exhibit B to be confidential.

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

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

9. ADDITIONAL INFORMATION THAT ATS BELIEVES MAY BE HELPFUL IN DETERMINING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED PURSUANT TO 47 CFR § 0.459(b)(9).

The information deals with ATS'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 at 407-794-3510 or ron@csilongwood.com.

Respectfully submitted,



Ron Shelton

Compliance Solutions, Inc.

Telecommunications Consultant To: Affiliated Technology Solutions, LLC.

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