

Compliance Solutions, Inc.

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March 18, 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 True Ip 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, True Ip Solutions, LLC. hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

True Ip Solutions, LLC. 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 "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 A is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. True Ip Solutions, LLC. 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, True Ip Solutions, LLC. hereby states as follows:

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

**True Ip Solutions, LLC.**  
CONFIDENTIAL AND PROPRIETARY INFORMATION  
CONFIDENTIAL INFORMATION FILED UNDER SEAL, PURSUANT TO 47 C.F.R. § 0.459

True Ip Solutions, LLC. seeks confidential treatment of Exhibit A in its entirety.

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

True Ip Solutions, LLC. is submitting confidential agreements between True Ip Solutions, LLC. as an attestation of Network Readiness between True Ip Solutions, LLC.'s and its interconnected VoIP carrier partner (Exhibit A) as proof of True Ip Solutions, LLC.'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 True Ip Solutions, LLC. 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 a commercial agreement between the interconnected VoIP partner and True Ip Solutions, LLC. to provide inbound DID services connecting to ILECs in the specified states and LATAs, all of which contain proprietary information concerning True Ip Solutions, LLC.'s network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERN'S 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 True Ip Solutions, LLC.'s disadvantage. True Ip Solutions, LLC. has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by True Ip Solutions, LLC. could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to True Ip Solutions, LLC.

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

**True Ip Solutions, LLC.**  
CONFIDENTIAL AND PROPRIETARY INFORMATION  
CONFIDENTIAL INFORMATION FILED UNDER SEAL, PURSUANT TO 47 C.F.R. § 0.459

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

True Ip Solutions, LLC. has not distributed the information in Confidential Exhibit A to the public or any parties within True Ip Solutions, LLC. or outside True Ip Solutions, LLC. 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).**

True Ip Solutions, LLC. deems the information in Exhibit A 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).**

True Ip Solutions, LLC. requests that Confidential Exhibit A 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 A.

**9. ADDITIONAL INFORMATION THAT TRUE IP SOLUTIONS, LLC. 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 True Ip Solutions, LLC. '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: True Ip Solutions, LLC.

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