

February 20, 2025

CONFIDENTIALITY REQUEST PURSUANT TO 47 C.F.R. § 0.459

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, NE
Washington, DC 20554

Re: Request for Confidential Treatment, Second Supplement to Application of Telimize LLC for Authority to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 24-656

Dear Ms. Dortch:

Telimize LLC ("Telimize") hereby submits the enclosed second supplement ("Second Supplement") to its application for authorization to obtain numbering resources and respectfully requests confidential treatment of the text indicated in the Second Supplement. Consistent with Sections 0.457 and 0.459 of the Commission's Rules, Telimize has provided a confidential version of the Second Supplement labelled "Confidential, Not for Public Inspection." Confidential treatment in this circumstance is fully consistent with the Administrative Procedure Act ("APA") and past Commission practice.

The redacted materials in the Second Supplement contain commercially sensitive information that identifies Telimize's vendor for 911 services. Confidential treatment of this information is appropriate under Exemption 4 of the Freedom of Information Act, which applies to information constituting "trade secrets and commercial or financial information." *See* 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).



In support of this request, Telimize provides the following information, as provided for under Section 0.459(b) of the Commission's Rules.

1. *Specific Information for Which Confidential Treatment is Sought - § 0.459(b)(1):*

Telimize requests that the redacted parts of the Second Supplement be withheld from public disclosure under 5 U.S.C. § 552(b)(4) and 47 C.F.R. § 0.457(d)(2). Specifically, the Second Supplement identifies one of Telimize's vendors and provides information from which its identity may be easily derived.

2. *Circumstances Giving Rise to the Submission - § 0.459(b)(2):* Telimize is submitting the information in the Second Supplement as proof that it complies with its 911 obligations under Part 9 of the Commission's Rules as required by section 52.15(g)(3)(i)(E) of the Commission's Rules.

3. *Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or Is Privileged - § 0.459(b)(3):* The Second Supplement discloses the name of Telimize's vendor and provides a copy of an executed service agreement with this vendor. This information is subject to exemption from public disclosure under FOIA Exemption 4.4. None of this information would normally be made available to the public, and public disclosure would make available to competitors proprietary information that is competitively sensitive and could undermine Telimize's business strategy. See 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d). To date, disclosure of the information and documents subject to this request has been limited to certain executives and employees of Telimize and their outside legal counsel, and Telimize's vendors.

4. *Degree to Which the Information Concerns a Service That is Subject to Competition - § 0.459(b)(4):* The market for interconnected voice over Internet Protocol ("VoIP") is highly competitive with low barriers to entry. The commercial information at issue goes directly to Telimize's ability to comply with the 911 service obligations applicable to all VoIP service providers. Thus, this information "concerns a service subject to competition." Accordingly, this information qualifies as sensitive internal business and commercial information entitled to protection under FOIA and the Commission's rules.

5. *How Disclosure of the Information Could Result in Substantial Competitive Harm - § 0.459(b)(5):* As the VoIP industry is highly competitive, and the nature of the confidential information is sensitive as to Telimize's relations with its vendors and technical processes, public release of the identity of Telimize's vendor as disclosed in the Second Supplement would cause significant competitive harm to Telimize. Moreover, Telimize's plans for complying with regulatory obligations to provide emergency services would become publicly known, which would not only cause competitive harm to Telimize, but could undermine Telimize's ability to provide safe and secure VoIP services to its end users.

6. *Measures Taken by Telimize to Prevent Unauthorized Disclosure - § 0.459(b)(6):* Telimize has limited access to the information and documents subject to this request to those officers, directors, employees, and counsel who require its disclosure in order to perform their duties. Telimize treats the

documents provided in the Second Supplement as confidential and proprietary and has not publicly disclosed this information.

7. *The Information Submitted is Not Available to the Public and Has Not Previously Been Disclosed to Third Parties, Except for Appropriately Limited Circumstances - § 0.459(b)(7):* To the best of Telimize's knowledge, the information and documentation for which confidential treatment is sought has not been publicly disclosed. Disclosure by Telimize has been limited to those with a need to know, and to those who are subject to professional or other confidentiality obligations.

8. *Period During Which the Submitted Material Should Not Be Available for Public Disclosure - § 0.459(b)(8):* Telimize respectfully requests that the confidential information in the Second Supplement be kept confidential indefinitely given the sensitive nature of this information and the risks inherent in any unauthorized disclosure. It is not clear at this time what potential period of non-disclosure is required in order to protect Telimize's interests.

9. *Other Information Supporting Request for Confidential Treatment - § 0.459(b)(9):* Not applicable.

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For the reasons stated above, Telimize requests that the Commission withhold from public inspection the information identified herein, according it full confidential treatment.

Respectfully submitted,

/s/ Jeffrey Carlisle
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Counsel for Telimize LLC

Enclosure

February 20, 2025

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: Second Supplement to Application of Telimize LLC for Authority to Obtain
Numbering Resources Pursuant to Section 52.15(g) of the Commission's
Rules, WC Docket No. 24-656**

Dear Ms. Dortch:

On behalf of Telimize LLC ("Telimize"), I provide this supplemental information relevant to the application for authority to obtain numbering resources ("Application") filed by Telimize in the abovementioned docket.¹

In further support of showing its compliance with 911 obligations as required by Section 52.15(g)(3)(i)(E)), Telimize provides as Exhibit A hereto [REDACTED]
[REDACTED] Telimize requests confidential treatment under the Commission's rules for this information.

A declaration under penalty of perjury pursuant to 47 C.F.R. § 1.16 is attached hereto as Exhibit B.

Thank you for your consideration of this supplemental information. If you have any questions about this filing, please do not hesitate to reach me by email or telephone.

¹ Application of Telimize LLC for Authorization to Obtain Numbering Resources, WC Docket No. 24-656 (filed Nov. 25, 2024).



Respectfully submitted,

TELIMIZE LLC

By: /s/ Jeffrey Carlisle
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(202) 429-8970

Its Attorney

cc: Jordan Marie Reth, WCB

EXHIBIT A
SERVICE AGREEMENT

[REDACTED IN FULL]

EXHIBIT B

DECLARATION OF GRANTHAM HAMM

I, Grantham Hamm, do hereby declare under the penalty of perjury, pursuant to 47 C.F.R. § 1.16, that the following is true and correct:

1. I am the Chief Executive Officer for Telimize, LLC (“Telimize”).
2. I have reviewed the foregoing Second Supplement to Application of Telimize for Authorization to Obtain Numbering Resources, and the Exhibit thereto, and I am familiar with their contents.
3. To the best of my knowledge, information and belief, all statements in the application and the Exhibit are true and accurate.

Executed on February 20, 2025

Grantham Hamm

Grantham Hamm
CEO
Telimize, LLC