

## Public Version

### Numbering Authorization Application

May 28, 2021

VIA ECFS & First Class Mail  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

RE: Request for Confidential Treatment of Filing of ECG, Inc.; Application of ECG, Inc. for Authorization to Obtain Numbering Resources, WC Docket No. 21-198

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

This filing includes confidential information. As contemplated by the Commission's rules, we are filing the public version electronically. ECG respectfully requests that, pursuant to Sections 0.457 and .0459 of the Commission's rules, 47 C.F.R. §§ 0.457 and 0.459, the Commission withhold from public inspection and grant confidential treatment to Exhibit A, a document that contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"). ECG is voluntarily providing this information, "of a kind that would customarily not be released to the public", therefore, this information is "confidential" under FOIA. Moreover, ECG would suffer substantial competitive harm if this information were disclosed. As such, Exhibit A is marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT – NOT FOR PUBLIC INSPECTION."

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

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

ECG seeks confidential treatment of **Exhibit A** to the enclosed application.

**2. DESCRIPTION OF THE CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.**

As proof of ECG's facilities readiness as required by Section 52.152(b)(3)(i)(D) of the Commission's rules, ECG is submitting the agreement between it and its carrier partner as **Exhibit A**.

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

The information for which ECG seeks confidential treatment contains sensitive commercial information which would customarily be guarded from competitors. **Exhibit A** describes the agreement between ECG and its carrier partner and contains proprietary commercial information concerning the operations and pricing of ECG's carrier partner and ECG's network, services, and operating costs and expenses.

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### **4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION.**

**Exhibit A** contains information relating to commercial matters that could be used by competitors to ECG's disadvantage. ECG has numerous competitors in the Voice over Internet Protocol ("VoIP") services sector in which it operates. Detailed operations and commercial information of the type provided by ECG could compromise ECG's position in this highly competitive industry. Release would therefore result in substantial competitive harm to ECG.

### **5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.**

Competitors could use ECG's proprietary commercial and operational information to ECG's detriment as they would gain access to sensitive information about how ECG provides services as well as about ECG'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.**

ECG has not distributed the information in **Exhibit A** to the public.

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

ECG has not previously disclosed the information in **Exhibit A** to the public or to third parties.

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

ECG requests that **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 **Exhibit A**.

### **9. OTHER INFORMATION THAT ECG BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.**

The information concerns ECG's proprietary network information, related to current and planned commercial and operational information, and, as such, is commercially sensitive.

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### APPLICATION OF ECG, INC FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES

This application is for ECG, Inc. a division of NG Telecom, Inc. hereafter ("ECG") located at 505 N Toombs Street Valdosta, GA 31601. The company phone number is 229-244-2099. The point of contact for regulatory requirements, compliance with commission rules, 911, and law enforcement is Stephen Rice 229-316-0011.

ECG acknowledges that the authorization granted in this section of the rules is subject to compliance with applicable commission numbering rules, numbering authority, delegated to the states, and industry guideline and practices regarding numbering as applicable to telecommunications carriers.

ECG further acknowledges that the applicant must file request for numbers with the relevant state commission at least thirty (30) days before requesting numbers from the Numbering Administrators.

ECG certifies that we are in compliance with our Universal Service Fund contribution obligations under 47 CFR part 54, subpart H, our Telecommunications Relay Service contribution obligations under 47 CFT Section 64.604(c)(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR Section 52.17, 52.32, its obligations to pay regulatory fees under 47 CFR Section 1.1154 and its 911 obligations under 47 CFR part 9.

ECG further certifies that it possesses the financial, managerial, and technical expertise to provide reliable service. Our Chief Technology Officer is Mark Lindsey. Mr. Lindsey is not currently nor has he previously been investigated by the Federal Communications commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

ECG further certifies that pursuant to 47 CFR Section 1.2001-1.2002 that no party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The state of initial service will be Georgia.

I am attaching with this application evidence to support our request for Numbering Authorization.

Sincerely,



Stephen Rice  
Controller  
ECG, Inc  
505 N Toombs Street  
Valdosta, GA 31601

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## **EXHIBIT A**

**CONFIDENTIAL MATERIALS OMITTED**

**AGREEMENT BETWEEN ECG AND CARRIER PARTNER**

**SUBJECT TO REQUEST FOR CONFIDENTIAL  
TREATMENT-  
NOT FOR PUBLIC INSPECTION**

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## **EXHIBIT B**

# **CARRIER PARTNER-LOCAL EXCHANGE CARRIER AGREEMENTS IN GA**

[https://psc.ky.gov/PSCICA/0000/00944/00944-AI\\_040108.pdf](https://psc.ky.gov/PSCICA/0000/00944/00944-AI_040108.pdf)