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July 24, 2020

PUBLIC VERSION –
CONFIDENTIAL INFORMATION EXCLUDED

VIA ECFS

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

Re: Supplement to the Application of Star2Star Communications, LLC, For
Authorization to Obtain Numbering Resources, Pursuant to Section 52.15(g), Docket No.
20-165

Dear Ms. Dortch:

Pursuant to §52.15(g)(3)(i) of the Commission’s Rules,¹ Star2Star Communications, LLC (“Star2Star”) applied for direct access to number resources in the above-captioned docket on June 8, 2020 (“Application”). By this letter, Star2Star supplements its Application for Authorization to Obtain Numbering Resources.

The ongoing contacts for Star2Star are as follows:

For 911 and Law Enforcement:

Shawn Solomon, EVP of Infrastructure and Dev-Ops
Star2Star Communications, LLC
600 Tallevast Road, Suite 202
Sarasota, FL 34243
Telephone: 941-234-0001
Facsimile: 941-355-7878
E-Mail: s@star2star.com

¹ 47 C.F.R. § 52.15(g).

Marlene Dortch, Secretary
Federal Communications Commission
July 24, 2020

Page 2 of 4

For Regulatory and Compliance:

Bruce H. Illes, Chief Legal Officer
Star2Star Communications, LLC
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E-mail: BIlles@star2star.com

In addition, Star2Star supplements its Application with a copy of its Service Addendum with its underlying carrier. Please note, this Service Addendum, marked as **Supplement Exhibit A**, contains confidential material, the disclosure of which would competitively harm the Company. Accordingly, Star2Star requests this material be filed under seal, pursuant to §0.459 of the Commission's Rules.² In support of this request, Star2Star submits the following:

1. Identification of the information for which confidential treatment is sought.

Star2Star seeks confidential treatment of **Supplement Exhibit A** to its Application, and specific references to these exhibits found in the body of its Application.

2. Description of the circumstances giving rise to the submission.

As part of its Application, Star2Star is including the agreement between its carrier partner as proof of its facilities readiness as required by §52.15(g)(3)(i)(D) of the Commission's Rules, and copies of a number of the carrier's interconnection agreements with incumbent carriers. The current **Supplement Exhibit A** is a Service Addendum to Star2Star's agreement with its carrier partner.

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 Star2Star seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors." **Supplement Exhibit A** to this Application describes the agreement between Star2Star and its carrier partner and contains proprietary commercial information concerning Star2Star's network, customers, financing, and services.

² 47 C.F.R. § 0.459.

Marlene Dortch, Secretary
Federal Communications Commission
July 24, 2020

Page 3 of 4

4. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*

Supplement Exhibit A contains information relating to commercial matters which can be used by other interconnected Voice over Internet Protocol (“VoIP”) providers to compromise Star2Star’s position in the highly competitive interconnected VoIP sector. Accordingly, release of this information would result in substantial competitive harm to Star2Star.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Competitors could use Star2Star’s proprietary commercial and operational information to Star2Star’s detriment as they would gain access to sensitive information concerning Star2Star’s commercial agreements, as well as information as to how Star2Star provides its services. This information is not typically disclosed publicly.

6. *Identification of any measures taken to prevent unauthorized disclosure, or if the information has been disclosed previously.*

Neither Star2Star nor its carrier-partner have distributed the information to the public or to any third party.

7. *Justification of the period during which Star2Star asserts that material should not be available for public disclosure.*

Star2Star requests that **Supplement Exhibit A** be treated as confidential for a minimum period of ten years. This period is necessary due to the nature of the proprietary information in the **Supplement Exhibit A** of the Application.

Two copies of this filing with the confidential information included are being submitted concurrently via overnight courier.

Thank you for your assistance in this matter and please do not hesitate to contact me at (202) 792-6422, or kmarshall@potomaclaw.com if you have any questions or concerns.

Respectfully submitted,



Katherine Barker Marshall, Counsel to Star2Star Communications, LLC

cc: Bruce Illes, Star2Star Communications, LLC

Supplement Exhibit A

Service Addendum

**Confidential and Proprietary – Filed Under Seal
Pursuant to 47 C.F.R. §0.459**