

September 1, 2023

FIRST-CLASS MAIL (Confidential filing)

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**Re: Request for Confidential Treatment of Filing of VoIP Stir PR
LLC.; *Application of VoIP Stir PR, LLC. for Authorization to
Obtain Numbering Resources, WC Docket No. 20 -***

Dear Secretary:

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, VoIP Stir PR, LLC. ("VoIP Stir"), 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 and the confidential version via first-class mail.

VoIP Stir 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 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").¹ VoIP Stir, LLC. is voluntarily providing this information, "of a kind that would customarily not be released to the public"; therefore, this information is "confidential" under FOIA.² Moreover, VoIP Stir would suffer substantial competitive harm if this information were disclosed.³ 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 rules,⁴ VoIP Stir hereby states as follows:

¹ 5 U.S.C. § 552(b)(4).

² *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

³ *See Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

⁴ 47 C.F.R. § 0.459(b).

1. **IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT.⁵**

VoIP Stir, LLC. seeks confidential treatment of *Exhibit A* to the enclosed application.

2. **DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.⁶**

As proof of VoIP Stir's facilities readiness as required by Section 52.15(b)(3)(i)(D) of the Commission's rules, VoIP Stir 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.⁷**

The information for which VoIP Stir seeks confidential treatment contains sensitive commercial information which would customarily be guarded from competitors.⁸ *Exhibit A* describes the agreement between VoIP Stir and its carrier partner and contains proprietary commercial information concerning the operations and pricing of VoIP Stir, LLC.'s carrier partner and VoIP Stir's network, services, and operating costs and expenses.

4. **EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION.⁹**

Exhibit A contains information relating to commercial matters that could be used by competitors to VoIP Stir's disadvantage. VoIP Stir 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 VoIP Stir could compromise VoIP Stir's position in this highly competitive industry. Release would therefore result in substantial competitive harm to VoIP Stir.

5. **EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.¹⁰**

Competitors could use VoIP Stir's proprietary commercial and operational information to VoIP Stir's detriment as they would gain access to sensitive information about how VoIP Stir provides services as well as about VoIP Stir's commercial agreements with others in the market that are not normally disclosed to the public.

⁵ 47 C.F.R. § 0.459(b)(1).

⁶ 47 C.F.R. § 0.459(b)(2).

⁷ 47 C.F.R. § 0.459(b)(3).

⁸ 47 C.F.R. §§ 0.457(d) and 0.459.

⁹ 47 C.F.R. § 0.459(b)(4).

¹⁰ 47 C.F.R. § 0.459(b)(5).

6. **IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.**¹¹

VoIP Stir 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.**¹²

VoIP Stir 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.**¹³

VoIP Stir 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 VoIP Stir, LLC. BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.**¹⁴

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

Any questions you may have regarding this filing should be directed to my attention at (541) 280-2588 or via email to allan.noorda@noordagroup.com. Thank you for your assistance in this matter.

Respectfully Submitted,

Allan Noorda | Director
Noorda Group LLC.,
Representative for VoIP Stir, LLC.

¹¹ 47 C.F.R. § 0.459(b)(6).

¹² 47 C.F.R. § 0.459(b)(7).

¹³ 47 C.F.R. § 0.459(b)(8).

¹⁴ 47 C.F.R. § 0.459(b)(9).

**Before the
Federal Communications Commission
Washington, D.C. 20554**

<i>In the Matter of</i>)	
)	
VoIP Stir PR, LLC.)	WC Docket No. 20 - ____
)	
For Authorization to Obtain Numbering)	
Resources Pursuant to Section 52.15(g) of)	
The Commission's Rules)	

**APPLICATION OF VoIP Stir, LLC. FOR AUTHORIZATION TO OBTAIN
NUMBERING RESOURCES**

VoIP Stir PR, LLC. ("VoIP Stir"), pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, respectfully requests authorization to obtain numbering resources as described below.

As set forth in the Commission's *Numbering Order*,¹ an interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon a showing that it is authorized to provide service in the area for which the numbering resources are requested. Such authorization may be obtained upon an application to the Commission containing the information detailed in Sections 52.15(g)(3)(i)(A)-(F) of the Commission's Rules. VoIP Stir a VoIP provider, hereby requests the Commission grant it that authorization. In support of this application, VoIP Stir provides the following information.

¹ *Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd. 6839 (2015).

I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i) (A)

§ 52.15(g)(3)(i)(A)

Name: VoIP Stir PR, LLC.

Physical Address: 1607 Poince De Leon Avenue, Suite GM8
San Juan, PR 00909

Mailing Address: 1607 Poince De Leon Avenue, Suite GM8
San Juan, PR 00909

Telephone: Toll Free: 800-610-4880
Local Number: 917-287-2067

Company Fax: 234-200-0588

Qualified Personnel: George Von Kaltner; President & CEO

Company Website: www.voipstir.com

Contact for Regulatory Requirements, Compliance, 911, and Law Enforcement:

Physical Address: 1607 Poince De Leon Avenue, Suite GM8
San Juan, PR 00909

Mailing Address: 1607 Poince De Leon Avenue, Suite GM8
San Juan, PR 00909

Telephone: 800-610-4880

Email:

(B) § 52.15(g)(3)(i)(B)

VoIP Stir hereby acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's Rules is subject to compliance with applicable

Commission numbering rules as well as to the numbering authority delegated to the states.

VoIP Stir hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers.

(C) § 52.15(g)(3)(i)(C)

VoIP Stir hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators.

(D) § 52.15(g)(3)(i)(D)

VoIP Stir hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. VoIP Stir intends to initially provide VoIP services in the United States through its own facilities and those of its CLEC partner(s) with which it has arrangements in place for routing traffic to the PSTN. Under its current agreements and established procedures, VoIP Stir will be able to place nearly all numbers into service within a short timeframe, and all numbers will be placed into service within 60 days of activation. As further proof of its facilities readiness, VoIP Stir has attached to this application, as ***Exhibit A***, a confidential agreement between VoIP Stir and its carrier partner providing that the carrier partner will provide switching and transport services for traffic associated with VoIP Stir's numbers and, in that connection, provide connectivity to the PSTN for inbound calls to and outbound calls from VoIP Stir numbers. (VoIP Stir has requested confidential treatment under the Commission's rules for ***Exhibit A***.) Also attached, as ***Exhibit B***, is evidence of interconnection agreements between VoIP Stir's carrier partner(s) and incumbent local exchange carriers.

(E) § 52.15(g)(3)(i)(E)

VoIP Stir hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H; its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii); its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17 and 52.32; its obligations to pay regulatory fees under 47 CFR § 1.1154; and its 911 obligations under 47 CFR part 9. VoIP Stir holds the FRN #0030805568 and the USAC 499 Filer ID # 834339.

(F) § 52.15(g)(3)(i)(F)

VoIP Stir hereby certifies that it has the managerial, financial and technical expertise to provide reliable service to Customers. VoIP Stir is financially stable, is led by an, experienced and seasoned management team with substantial leadership experience in the telecommunications and technology industry. Additionally VoIP Stir has sound, complete and strong technical expertise along with the infrastructure in place to provide reliable numbering and related VoIP services.

VoIP Stir far exceeds the technical qualifications necessary to provide and maintain successful operations within its given service area. VoIP Stir also has the capabilities to efficiently port and place numbers into service and successfully route calls. Additionally, VoIP Stir key management team has long term experience and expertise in the telecommunications field along with having with deep experience in number porting therefore enabling VoIP Stir along with its carrier partners, to create routing arrangements that seamlessly deliver calls to numbers directly assigned to VoIP Stir.

VoIP Stir's personnel have extensive business and management experience in telecommunications and technology related businesses and in serving its targeted customer segment, including telecommunications carriers, IP service providers, and business customers of IP, communications, information and technology services. These individuals lead a team that is highly qualified to manage the technical and functional operations of VoIP Stir throughout its service area. VoIP Stir's key management and technical team members are listed below and also in exhibit C. None of the identified personnel is being or has been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

Key Personnel:²

George Von Kaltner, President & CEO
Maxim Doumkine, CTO

(G) § 52.15(g)(3)(i)(G)

VoIP Stir hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)

As required by Section 52.15(g)(3)(iv), VoIP Stir will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within 30 days of any changes. VoIP Stir will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

III. CONCLUSION

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, VoIP Stir PR, LLC. respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

Allan Noorda | Director
Noorda Group LLC.,
Representative for VoIP Stir, LLC.

² Attached hereto, as ***Exhibit B***, are the names, titles, biographies, and contact information of VoIP Stir PR, LLC's key management and technical personnel.

EXHIBIT A
CONFIDENTIAL MATERIALS OMITTED

AGREEMENT
BETWEEN VOIP STIR, LLC, AND CARRIER PARTNERS

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

EXHIBIT B

VoIP Stir, LLC.

KEY MANAGEMENT AND TECHNICAL PERSONNEL

George Von Kaltner: President & CEO

George brings over 20 years of CEO experience and leadership to VoIP Stir. With his innovative vision for service provisioning and technology demands also devised around regulatory and market conditions George continues to lead VoIP Stir's clients and partners into a leading service provider.

Maximum Doumkin: CTO

Maxim is a serial developer with designs spanning multiple telecom market sectors. With over 15 years as a Chief Technology Officer, Maxim has been managing, developing and implementing complex solutions that brings continuity to VoIP Stir and a solid roadmap to our internal projects. His presence as the CTO of VoIP Stir has been crucial in the development for VoIP Stir's corporate strategies

