

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
TNC Communications, Inc. Application) WC Docket No. 20-_____
For Authorization to Obtain Number)
Resources Pursuant to Section 52.15(g))
of the Commission's Rules)

**APPLICATION OF TNC COMMUNICATIONS HOLDING CORP.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

TNC Communications, Inc. (“TNC”), pursuant to Section 51.15(g)(3)(i) of the Commission’s Rules, requests authorization to obtain numbering resources. The Commission authorized interconnected VoIP providers such as TNC to obtain numbering resources from the Number Administrator in its *Numbering Order*.¹ This Application complies with the requirements set forth in Sections 52.15(g)(3)(i)(A)-(F) of the Commission’s Rules. In support of this application, TNC provides the following information:

1) INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)

(A) § 52.15(g)(3)(i)(A)

Name: TNC Communications, Inc.
Address: 624 Holly Springs Road, Suite 409
Holly Springs, NC 27540
Telephone: (919) 275.5172

Qualified Regulatory and Compliance Contact: Addam Holdorf

¹ *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015).

(B) § 52.15(g)(3)(i)(B)

TNC 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. TNC hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, just as to telecommunication carriers

(C) § 52.15(g)(3)(i)(C)

TNC 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)

TNC submits that it is capable of providing service within 60 days of the number resources activation date. TNC obtains interconnection with the PSTN pursuant to an agreement with a CLEC partner for routing its VoIP traffic to ILECs. TNC has attached the agreement to this application as **Exhibit 1**. TNC has requested confidential treatment under the Commission's rules for **Exhibit 1**. Pursuant to this agreement, the CLEC partner will provide PSTN connectivity for inbound calls to TNC numbers via the CLEC's tandem switches.

TNC currently has telephone numbers in service in Georgia, South Carolina, North Carolina, Florida, and Texas. It currently obtains telephone numbers from CLEC partners. TNC has obtained an OCN (479J), that is associated with a NECA category of Internet Protocol Enabled Services. TNC will ensure that its OCN is listed in the LERG and NPAC by the time it received authority to obtain numbers directly. While TNC currently relies on CLEC partners to perform number portability, TNC is familiar with the FCC's requirements for porting telephone numbers and acknowledges its obligations to comply with those requirements.

(E) § 52.15(g)(3)(i)(E)

TNC hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H, its Telecommunications Relay Service contribution obligation 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, 52.32, its obligation to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9. A written certification confirming compliance with all these obligations is provided as **Exhibit 2**.

(F) § 52.15(g)(3)(i)(F)

TNC hereby certifies that it has the managerial, technical, and financial ability to provide reliable service. TNC is a wireless and fiber provider that provides high speed internet and phone services via VoIP primarily to commercial customers.

TNC's key management and technical personnel are listed below. None of the identified personnel are being or have been investigated by the Commission or any regulatory agency for failure to comply with any law, rule, or order.

Key Personnel:

Chief Executive Officer: Addam Holdorf has been an executive in the telecommunication industry for over 15 years. He has overseen regulatory issues, financial and technical issues with each of the companies he has worked for or owned. Addam has numerous educational achievements.

Vice President of Operations: Thomas Miller has been an executive in the telecommunications industry for over 10 years. He has overseen financials, operations, and technical requirements as well as regulatory issues for the companies he has worked for or owned.

Lead Technical Engineer III: Jeremy Marsh has been an expert in the telecommunications industry for over 25 years. He has overseen the technical requirements and background of all issues related to telecommunications for each of the companies he has worked for or owned.

(G) § 52.15(g)(3)(i)(G)

TNC 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.

2) ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)

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

3) CONCLUSION

Pursuant to Section 52.15(g)(3)(i) of the Commissions' Rules, TNC respectfully requests that the Commission grant this application for authorization to obtain number resources in North Carolina, South Carolina, Georgia, Florida, and Texas.

Respectfully submitted,

/s/ Addam Holdorf

CEO for TNC Communications, Inc.

OFFICER VERIFICATION

I, Addam Holdorf, CEO of TNC Communications, Inc. do hereby declare under penalty of perjury that the above Application is true and correct as written to the best of my knowledge and belief. Further I attest that the submission is complete and accurate, with no material omissions.

Executed on this 1st day of July in 2020 at Raleigh, North Carolina.



Addam Holdorf

STATES IN WHICH NUMBERS WILL BE REQUESTED

- 1) North Carolina
- 2) South Carolina
- 3) Georgia
- 4) Florida
- 5) Texas

Exhibit 1

**AGREEMENT BETWEEN TNC COMMUNICATIONS,
INC AND CARRIER PARTNER**

(Confidential exhibit submitted separately)



TNC Communications
624 Holly Springs Rd.
Suite 409
Holly Springs, NC 27540

Addam Holdorf
CxO Emerging Markets & Hospitality Team

T 919.275.5172
addam@tnccompany.com
tnccompany.com

E X H I B I T 2

To Whom It May Concern:

As an Officer of TNC Communications, I certify the following:

- TNC Communications is up to date on its obligations to pay regulatory fees.
- TNC Communications is up to date on its North American Numbering Plan and Local Number Portability Administration contributions
- TNC Communications is up to date on our Universal Service Fund contributions.
- TNC Communications is up to date on our Telecommunications Relay Service contributions.
- TNC Communications is up to date on its 911 obligations under 47 CFR part 9.
- No party to this application is subject to a denial of Federal benefits pursuant to the Anti-Drug Abuse Act (convictions under Federal or State laws for possession or distribution of controlled substances)

If you have any questions or concerns, please contact me at addam@tnccompany.com

Respectfully,

Addam Holdorf

Addam Holdorf
CEO
TNC Communications, Inc.





TNC Communications
624 Holly Springs Rd.
Suite 409
Holly Springs, NC 27540

Addam Holdorf
CxO Emerging Markets & Hospitality Team

T 919.275.5172
addam@tncrelated.com
tncrelated.com

Via Electronic Comment Filing System & Federal Express

Date: 1-JULY-2020

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

Re: Request for Confidential Treatment for Application of TNC Communications, Inc. For Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules

Dear Ms. Dortch:

Pursuant to Section 51.15(g)(3)(i) of the Commission's Rules, TNC Communications, Inc. ("TNC") hereby submits its application requesting authorization to obtain numbering resources.

TNC 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 treatment Exhibit 1 to this application as confidential because that document contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").¹ The information in Exhibit 1 is "of a kind that would not customarily be released to the public," therefore, this information qualified for confidential treatment under FOIA². TNC respectfully submits that it would suffer substantial competitive harm if this information were disclosed.³

Exhibit 1 is accordingly marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT - NOT FOR PUBLIC INSPECTION."

¹ 5 U.S.C. § 552(b)(4).

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

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



In support of this request and pursuant to Section 0.459(b) of the Commission's rules,⁴ TNC hereby states as follows:

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT⁵

TNC seeks confidential treatment of Exhibit 1 to the enclosed application.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION⁶

TNC is submitting the Confidential agreement between it and its carrier partner, as proof of TNC'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 PRIVILEGED⁷**

The information for which TNC seeks confidential treatment contains sensitive commercial information “which would customarily be guarded from competitors.”⁸ Exhibit 1 consists of a commercial agreement between TNC and its carrier partner and contains proprietary commercial information concerning TNC’s network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNs A SERVICE THAT IS SUBJECT TO COMPETITION⁹

Exhibit 1 contains information relating to commercial matters that could be used by competitors to TNC's disadvantage. TNC 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 TNC could compromise TNC's positions in this highly competitive industry. Release would therefore result in substantial competitive harm to TNC.

⁴ 47 C.F.R. § 0.459(b).

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. § 0.459(b)(2).

⁹ 47 C.F.R. § 0.459(b)(4).

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM¹⁰

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

6. IDENTIFICATION OF ANY MEASURE TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE¹¹

TNC has not distributed the information in Exhibit 1 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 PARTIES¹²

TNC has not previously disclosed the information in Exhibit 1.

8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE¹³

TNC requests that Exhibit 1 be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information in Exhibit 1.

9. OTHER INFORMATION THAT TNC BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED¹⁴

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

Should you have any questions regarding the foregoing information, please don't hesitate to contact me.

Respectfully submitted,

/s/ Addam Holdorf

¹⁰ 47 C.F.R. § 0.459(b)(5).

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).