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September 12, 2018

VIA ECFS

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

RE: Request for Confidential Treatment to Application of Hadlo Technologies, LLC for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of the Commission's Rules

Dear Ms. Dortch,

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

Hadlo 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, Exhibit A to this application in its entirety as confidential because the documents contain trade secrets and commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). The information in Exhibit A is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. Hadlo respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibit A is accordingly marked with "Confidential and Proprietary – Filed Under Seal Pursuant to 47 C.F.R. §0.459."

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

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT PURSUANT TO 47 CFR § 0.459(b)(1).

Hadlo seeks confidential treatment of Confidential Exhibit A in its entirety.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION PURSUANT TO 47 CFR § 0.459(b)(2).

Hadlo is submitting the confidential agreements between it and its LEC partner as proof of Hadlo'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 PRIVILEGED PURSUANT TO 47 CFR § 0.459(b)(3).

The information for which Hadlo seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors" as defined in 47 CFR § 0.457(d)(2). Confidential Exhibit A consists of commercial agreements between Hadlo and its LEC partner of which contain proprietary information concerning Hadlo's network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION PURSUANT TO 47 CFR § 0.459(b)(4).

Confidential Exhibit A contains information relating to commercial matters that could be used by competitors to Hadlo's disadvantage. Hadlo has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by Hadlo could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to Hadlo.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM PURSUANT TO 47 CFR § 0.459(b)(5).

Competitors could use Hadlo's proprietary and commercial information to its detriment as they would gain access to sensitive data about how Hadlo provides services as well as about Hadlo'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 PURSUANT TO 47 CFR § 0.459(b)(6).

Hadlo has not distributed the information in Confidential Exhibit A to the public or any parties within Hadlo or outside Hadlo except on a need-to-know basis.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES PURSUANT TO 47 CFR § 0.459(b)(7).

Hadlo has not previously disclosed the information in Confidential Exhibit A.

8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(8).

Hadlo requests that Confidential 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 Confidential Exhibit A.

9. OTHER INFORMATION THAT HADLO BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED PURSUANT TO 47 CFR § 0.459(b)(9).

The information concerns Hadlo's proprietary network, related to current and planned operations, and as such, is commercially sensitive.

If you should have any questions or concerns, please feel free to contact me at your convenience.

Respectfully submitted,

By: _____
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Hadlo Technologies, LLC) WC Docket No. 18- _____
For Authorization to Obtain Numbering)
Resources Pursuant to Section 52.15(g) of)
The Commission's Rules)

**APPLICATION OF HADLO TECHNOLOGIES, LLC
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Hadlo Technologies, LLC (“Hadlo”), pursuant to Section 52.15(g)(3)(i) of the Commission’s Rules, respectfully requests authorization to obtain numbering as described below. Under 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 Section 52.15 (g)(3)(i)(A)-(G) of the Commission’s Rules. Hadlo hereby requests the Commission grant it that authorization. In support of this application, Hadlo provides the following information:

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

A. § 52.15(g)(3)(i)(A)

Name: Hadlo Technologies, LLC
Address: 3982 Powell Rd. Suite #125
City: Powell
State: Ohio
ZIP Code: 43066
Telephone: (888) 485-9061

Contact for Regulatory Requirements, Compliance, 911 and Law Enforcement:
Name: Thomas Hadden, President
Address: 3982 Powell Rd. Suite #125
City: Powell
State: Ohio
ZIP Code: 43066
Telephone: (888) 485-9061
Fax: (888) 491-4806
Email: corp@hadlotechnologies.com

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

B. § 52.15(g)(3)(i)(B)

Hadlo 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. The Company hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, as applicable to telecommunications carriers. Hadlo intends to offer services immediately in Ohio and Tennessee but seeks authority to access numbering resources throughout the United States.

C. § 52.15(g)(3)(i)(C)

Hadlo 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)

Hadlo hereby sets forth its capability to provide service within 60 days of the numbering resources activation date. Hadlo is a recently-established interconnected VoIP providing messaging and network services for businesses located in the United States. The Company was founded by an experienced telecommunications professional and has an agreement in place with Inteliquent, Inc., a Competitive Local Exchange Company, to serve as Hadlo's access homing tandem and to route traffic. Hadlo will interconnect with and broadcast Inteliquent's tandem platforms for the purposes of managing all codes assigned to Hadlo OCNs. The agreement demonstrating the access to this platform and capability is attached to this application as Confidential Exhibit A.

E. § 52.15(g)(3)(i)(E)

Hadlo hereby certifies that it will comply 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.

F. § 52.15(g)(3)(i)(F)

The Company certifies that it has the financial, managerial, and technical expertise to provide reliable service. It is financially stable, led by a strong, experienced management team with substantial managerial experience in the telecommunications industry, and has sufficient technical expertise and infrastructure in place to provide reliable numbering services. Hadlo's key management and technical personnel are identified in attached Exhibit B. None of the identified personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

G. § 52.15(g)(3)(i)(G)

Hadlo 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), Hadlo 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. Hadlo 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, Hadlo Technologies, LLC respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

By: 

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Confidential Exhibit A

Hadlo Technologies, LLC- Inteliquent Agreements

Master Services Agreement

Access Homing Tandem

International Long Distance

Domestic Local and Long Distance

Originating Access Service Schedule

Confidential and Proprietary – Filed Separately Under Seal

Pursuant to 47 C.F.R. §0.459

Exhibit B

Key Managerial and Technical Personnel

EXHIBIT 4

Management Team Profiles

Thomas H. Hadden , President and CEO

As president of Hadlo Technologies, LLC., Thomas Hadden brings more than twenty-five years' experience in designing, developing and marketing Telecommunications, VoIP, wide-area networking and storage management products.

Prior to starting Hadlo Technologies, LLC. Mr. Hadden serves as Chairman of the Board and CEO for Tandem Telephone, Inc. A Georgia based CLEC, Kinloch Telephone, Inc. A Georgia based CLEC., Anderson Telephone, Inc. a South Carolina CLEC, and Carrboro Telephone, Inc. a North Carolina, CLEC. Mr. Hadden developed, Telecom solutions for these companies, utilizing, VoIP, SS7, SMS/800, LNP, and a Telecommunications Billing System capable of importing Call Detail Records from my different Telecommunication Switches, and exporting to standards such as EMI for export to Carrier Access Billing ("CABs")

During the 1999 to 2002 period Mr. Hadden served as the Chief Network officer for Universal Access "UAXS," which went public in 2000, as symbol UAXS. During this period Universal Access built out 12 Carrier Collocation sites and completed CLEC status in 6 States. Mr. Hadden was responsible for All Carrier Interconnections, Collocation, Network Operations, Network Monitoring and 24 x 7 Network Operations Center ("NOC").

Prior to Universal Access, Inc., Mr. Hadden was President of Vaultline, Inc. in the bay area of California. Vaultline was one of the first un-regulated carriers to operate a OC48 SONET ring around the entire bay area in California with what was Pacific Bell at that time.

Mr. Hadden also co-founded Synergistic Networking Solutions, Inc. in 1993, a software developing company providing OEMs with innovative storage management software capable of modular data storage from the desktop environment.

As manager of Intel's application-specific servers and network products, Mr. Hadden was responsible for assessing market needs and employing strategic product development. While with Tecmar, Inc., a data storage and communications product manufacturer, Mr. Hadden developed a series of products, including the entire line of ProLine tape backup systems and ProServe software.

Recognized as an expert in network disaster prevention and recovery, Mr. Hadden worked with NASA at the Headquarters building in COCA Beach Florida on networking facilities prior to the test bed for Pre Launch Shuttle sequencing. M. Hadden also served as technical editor for

Patrick H. Corrigan's Backing Up NetWare Lans (M&T Books), and has had articles published in LAN Times, LAN Technology, NetWare Technical Journal, Computer Technology Review and Computing Canada. Additionally, he has spoken publicly at trade events such as Interop, NetWorld, Networks Expo and PC Expo.

Terri Rose, Secretary

Ms. Rose has been involved in multiple start-up communications companies over the last 16 years, with Mr. Hadden and serves on the Board and Advisors Board for Tandem Telephone, Kinloch Telephone, Carrboro Telephone, and Anderson Telephone.

Cathryn M. Zygadlo, E.V.P / Treasurer

Ms. Zygadlo is responsible for overseeing the day-to-day operations for the company. Ms. Zygadlo is also responsible for managing a staff of project managers to complete projects while maintaining communications with both vendors and customers. Ms. Zygadlo will be coordinating with vendors, customers and management to ensure Hadlo Technologies, LLC., services meet or exceed customer expectations while carefully managing all cost aspects. Ms. Zygadlo will also provide support to the Sales and Accounting areas.

Prior to Hadlo Technologies, LLC., Ms. Zygadlo worked for iNetworks where she was the Director of Operations. Ms. Zygadlo managed the staff and coordinated all reporting activities. Ms. Zygadlo designed the internal processes for iNetworks and managed the installation of over 100 million dollars in circuits monthly while maintaining strict Government specifications.

Ms. Zygadlo was VP of Operations in charge of all provisioning, design, installation and customer satisfaction staff at Universal Access, Inc. Ms. Zygadlo was the 7th employee for Universal Access and helped grow the business into a multi-million dollar public company. Ms. Zygadlo was also responsible for integration of multiple software company purchases, producing Universal Access, Inc.'s first pricing and tariff management software.

Ms. Zygadlo has been working in Telecommunication Operations for 19 years.

- ❖ USN Communications – Director, Customer Support – 1994 through 1996
- ❖ Universal Access – VP Operations – 1996 through 2007
- ❖ INetworks – Director of Operations – 2007 through 2009

Mark Bown, VP Engineering

Mark Bown was one of the Chief Architects with Mr. Hadden at Vaultline in the Bay Area. Mr. Bown also serves as a network consultant to Tandem Telephone Inc. where he helps design, maintain the current fiber network and switching equipment and has continued through the years to expand on his expertise and currently is a CCNE (Cisco Certified Network Engineer) and will continue to work with the new CLEC on design and deployment of its network infrastructure primarily used in the VoIP edge to customers. He will also be involved with Ms. Zygodlo and Thomas Hadden in the continued expansion of the SS7 network to targeted Tandems for interconnection to ILECs and IXCs.

UFA Director Technical Analyst /Network Development 2007 -2008

- Designed and implemented the IT infrastructure for the new 5 story UFA head office. Working with architects, construction crews, and Telco's to provide direction. Creating a completely fault tolerant network, and changing the internal infrastructure
- Designed and implemented all the IT infrastructure for over 20 retail stores and gas stations
- Redesigned the Red Deer UFA Farm store, converting from a single store to a four building campus
- Implemented a complete Nortel VoIP telephone system replacing the older analog systems. Creating a two core system and tied Red Deer's location into the system
- Acquired /22 from ARIN in order to establish UFA as their own ISP never having to change IPs again
- Redesigned UFA's internal network, segmenting essential network elements and creating a secure environment
- Cleaned up 7 major security holes, establishing a clean network with VPN access
- Created a template system for new builds giving UFA IT standards for network and building structure
- Converted the static routing structure to a EIGRP and BGP setup
- Migrated over 60 56k frame relay connection to ADSL with minimal down time
- Created a mobile networking package that allowed UFA to utilize EVDO in order to act as an emergency network connection as well as to provide connection to sites that would not meet UFA required install date by the local Telco

MTS Allstream Sr. Network Consultant 2006-2007

- Evaluated and redesigned over 40 Customer LAN/WAN
- Sr. Fault isolation specialist for Allstream's Cisco Clients
- Installed and maintained many cross country connection from Canada to USA
- Installed Cisco ASAs, Cisco NAC, and other security appliances

GDC/Layer One Networking Consultant 2004-2006

- Acquired 7 /20, 2 /19 IP blocks, established 12 Organization IDs, from ARIN for GDC

- Created 6 major networks with intricate BGP routing policies over multiple ISPs
- Documented and analyzed 27 networks, correcting and improving each design
- Managed routing policy for 14 independent networks with a total of 31 ISP's
- Restructured over 20 network routing systems

Optigate Networks	Director of Engineering	2000–2004
	<ul style="list-style-type: none"> ■ Acquired 2 /18, 3 /19, and 5 /20 IP blocks from ARIN for Optigate and its customers ■ Directed and coordinated all internet connectivity for InterOpt Show in Las Vegas for 2003 and 2004 ■ Developed a voice TDM and IP Department for International VOIP wholesale ■ Established peering with over 135 peers to reduce our transit cost by 50% ■ Acquired the routing appliances to streamline routing through our lower cost transit providers ■ Acted as lead Engineer for the Wireless Department ■ Held training classes for technicians on everything from cabling to BGP ■ Helped develop the Abuse Department for spam complaints ■ Developed a network routing structure for internal routes with the Optigate Atominus System Using BGP4 and OSPF as the catalyst ■ Started the deployment of Cisco routers around the nation and established BGP4 routing policies to be used with other Atominus Systems Nationally ■ Identified many BGP4 Routing problems on the network and reduced traffic to a provider that was incorrectly billing the company for transit ■ Created networking and system standards for the company in the form of White papers and procedures ■ Implemented a monitoring system via MRTG, Nagios, and Big Brother ■ Network documentation and development for internal and customers use ■ Co-Designed and oversaw construction of the First A-Class data facility in Jakarta, Indonesia 	
Globix Corp.	Sr. Network Engineer	1999–2000
	<ul style="list-style-type: none"> ■ Backbone network fault isolation, specializing in ATM and BGP ■ Implemented the solution to provide DS1, fractional DS1, and frame relay from all of our worldwide locations via ATM(BPX,IGX) ■ Wrote the instructional documentation to support installation and maintenance of all ATM circuits ■ Reduced our cost on all Cisco equipment by 4 points, establishing a strong relationship between us and a new Cisco reseller ■ Network documentation and development for internal use and customers 	

Digital Island Inc.

Network Engineer
1998–1999

- Project Coordination of customer installation, and International Data Center build-outs
- Customer and peer BGP turn up and route a maintenance
- Data Center build-out, overseeing rack and room layout, cable installation, carrier facility installation, as well as dealing with local contractors and unions
- Helped design and implement new data facility in the Docklands of London, England
- Network product research and acquisition, and supplier relations
- Writing network documentation and instructional teaching aids on procedures as well as hardware installation

Vaultline Inc.

Chief Development Engineer

1997–1998

- In charge of maintaining levels of standards for all OC carrier connections pertaining to our Stratacom BPX ATM switch and Cisco routers
- Acquired a /16 from ARIN and maintained all IP records