

January 29, 2025

CONFIDENTIALITY REQUEST PURSUANT TO 47 C.F.R. § 0.459

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, NE
Washington, DC 20554

Re: Request for Confidential Treatment, Supplement to Application of Telimize LLC for Authority to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 24-656

Dear Ms. Dortch:

Telimize LLC (“Telimize”) hereby submits the enclosed supplement (“Supplement”) to its application for authorization to obtain numbering resources and respectfully requests confidential treatment of the text indicated in the Supplement. Consistent with Sections 0.457 and 0.459 of the Commission’s Rules, Telimize has provided a confidential version of the Supplement labelled “Confidential, Not for Public Inspection.” Confidential treatment in this circumstance is fully consistent with the Administrative Procedure Act (“APA”) and past Commission practice.

The redacted materials in the Supplement contain commercially sensitive information that identifies Telimize’s vendors for interconnection, numbering and 911 services. Confidential treatment of this information is appropriate under Exemption 4 of the Freedom of Information Act, which applies to information constituting “trade secrets and commercial or financial information.” *See* 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).



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In support of this request, Telimize provides the following information, as provided for under Section 0.459(b) of the Commission's Rules.

1. Specific Information for Which Confidential Treatment is Sought - § 0.459(b)(1):

Telimize requests that the redacted parts of the Supplement be withheld from public disclosure under 5 U.S.C. § 552(b)(4) and 47 C.F.R. § 0.457(d)(2). Specifically, the Supplement identifies Telimize's vendors and provides information from which their identities may be easily derived.

2. Circumstances Giving Rise to the Submission - § 0.459(b)(2): Telimize is submitting the information in the Supplement as proof that (i) it is capable of providing service within sixty days of the numbering resources activation date as required by section 52.15(g)(3)(ii)(H) of the Commission's rules and (ii) it complies with its 911 obligations under Part 9 of the Commission's Rules as required by section 52.15(g)(3)(i)(E) of the Commission's Rules.

3. Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or Is Privileged - § 0.459(b)(3): The Supplement discloses the names of Telimize's vendors and provides links to (i) agreements between one of Telimize's vendors and incumbent local exchange carriers and (ii) terms and conditions of service for Telimize's 911 vendors. This information is subject to exemption from public disclosure under FOIA Exemption 4.4. None of this information would normally be made available to the public, and public disclosure would make available to competitors proprietary information that is competitively sensitive and could undermine Telimize's business strategy. See 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d). To date, disclosure of the information and documents subject to this request has been limited to certain executives and employees of Telimize and their outside legal counsel, and Telimize's vendors.

4. Degree to Which the Information Concerns a Service That is Subject to Competition - § 0.459(b)(4): The market for interconnected voice over Internet Protocol ("VoIP") is highly competitive with low barriers to entry. The commercial information at issue goes directly to Telimize's ability to comply with the 911 service obligations applicable to all VoIP service providers and to provide VoIP service by interconnecting with the PSTN through its vendor. Thus, this information "concerns a service subject to competition." Accordingly, this information qualifies as sensitive internal business and commercial information entitled to protection under FOIA and the Commission's rules.

5. How Disclosure of the Information Could Result in Substantial Competitive Harm - § 0.459(b)(5): As the VoIP industry is highly competitive, and the nature of the confidential information is sensitive as to Telimize's relations with its vendors and technical processes, public release of the identity of Telimize's vendors as disclosed in the Supplement would cause significant competitive harm to Telimize. Moreover, Telimize's plans for complying with regulatory obligations to provide emergency services and facilities readiness would become publicly known, which would not only cause competitive harm to Telimize, but could undermine Telimize's ability to provide safe and secure VoIP services to its end users.

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6. Measures Taken by Telimize to Prevent Unauthorized Disclosure - § 0.459(b)(6): Telimize has limited access to the information and documents subject to this request to those officers, directors, employees, and counsel who require its disclosure in order to perform their duties. Telimize treats the documents provided in the Supplement as confidential and proprietary and has not publicly disclosed this information.

7. The Information Submitted is Not Available to the Public and Has Not Previously Been Disclosed to Third Parties, Except for Appropriately Limited Circumstances - § 0.459(b)(7): To the best of Telimize's knowledge, the information and documentation for which confidential treatment is sought has not been publicly disclosed. Disclosure by Telimize has been limited to those with a need to know, and to those who are subject to professional or other confidentiality obligations.

8. Period During Which the Submitted Material Should Not Be Available for Public Disclosure - § 0.459(b)(8): Telimize respectfully requests that the confidential information in the Supplement be kept confidential indefinitely given the sensitive nature of this information and the risks inherent in any unauthorized disclosure. It is not clear at this time what potential period of non-disclosure is required in order to protect Telimize's interests.

9. Other Information Supporting Request for Confidential Treatment - § 0.459(b)(9): Not applicable.

* * * * *

For the reasons stated above, Telimize requests that the Commission withhold from public inspection the information identified herein, according it full confidential treatment.

Respectfully submitted,

/s/ Jeffrey Carlisle
Jeffrey Carlisle
Lerman Senter PLLC
2001 L Street, NW, Suite 400
Washington, DC 20036-4945
(202) 429-8970

Counsel for Telimize LLC

Enclosure

January 29, 2025

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Supplement to Application of Telimize LLC for Authority to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 24-656

Dear Ms. Dortch:

On behalf of Telimize LLC (“Telimize”), I provide this supplemental information relevant to the application for authority to obtain numbering resources (“Application”) filed by Telimize in the abovementioned docket.¹ Commission staff requested this information to correct, augment and clarify information Telimize submitted as part of the Application.

1. Correction

The Application states the formal name of Telimize as “Telimize, LLC.” As filed with the Wyoming Secretary of State, however, the entity’s formal name is “Telimize LLC” without a comma.

2. Ownership Chart

As required by 47 C.F.R. § 63.18(h)(2), Exhibit A provides a diagram illustrating Telimize’s vertical ownership structure, including all direct and indirect ownership interests held by individuals named in the application in response to § 63.18(h)(1).

¹ Application of Telimize LLC for Authorization to Obtain Numbering Resources, WC Docket No. 24-656 (filed Nov. 25, 2024).



3. Certification re Foreign Carriers

As required by 47 C.F.R. § 63.18(i), Telimize certifies that it is not a foreign carrier, and is not affiliated with any foreign carrier.

4. Facilities Readiness Documentation (Section 52.15(g)(3)(ii)(H))

In further support of showing its capability to provide service within 60 days of the numbering resources activation date, Telimize provides the following links to publicly available interconnection agreements between Telimize's carrier partner disclosed in the Application and incumbent local exchange carriers. These interconnection agreements with Telimize's carrier partner demonstrate current interconnection with the public switched telephone network in a sample of the main markets where Telimize intends to begin providing service using numbering resources:

[REDACTED] Telimize requests confidential treatment under the Commission's rules for this information.

5. Certification Regarding 911 (Section 52.15(g)(3)(i)(E))

In further support of showing its compliance with 911 obligations, Telimize provides

Additionally, since the filing of the Application, Telimize has arranged for backup E911 services from [REDACTED] [REDACTED]

[REDACTED] Telimize requests confidential treatment under the Commission's rules for this information.

6. Physical Address

The physical address of Telimize's offices is at 700 NW 4th St., # 203, Oklahoma City, Oklahoma 73102.

7. Declaration

A declaration under penalty of perjury pursuant to 47 C.F.R. § 1.16 is attached hereto as Exhibit B.

Thank you for your consideration of this supplemental information. If you have any questions about this filing, please do not hesitate to reach me by email or telephone.

Respectfully submitted,

TELIMIZE LLC

By: /s/ Jeffrey Carlisle
Jeffrey Carlisle
Lerman Senter PLLC
2001 L Street, NW, Suite 400
Washington, D.C. 20036
(202) 429-8970

Its Attorney

cc: Jordan Marie Reth, WCB

EXHIBIT A
Telimize Ownership Chart

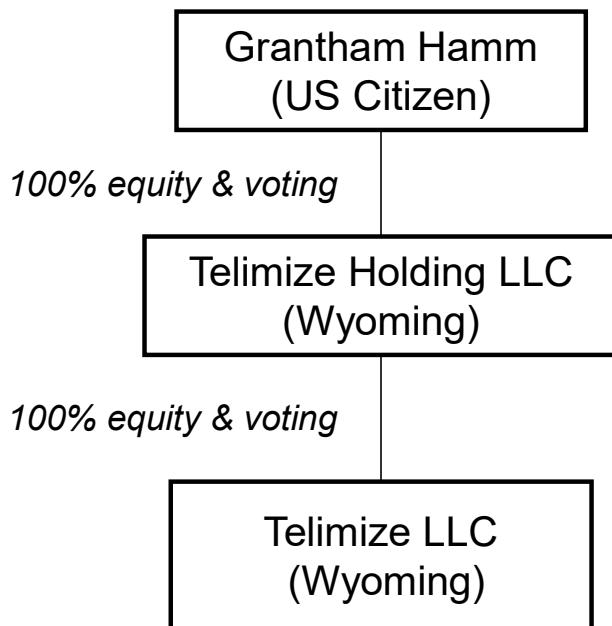


EXHIBIT B

DECLARATION OF GRANTHAM HAMM

I, Grantham Hamm, do hereby declare under the penalty of perjury, pursuant to 47 C.F.R. § 1.16, that the following is true and correct:

1. I am the Chief Executive Officer for Telimize, LLC (“Telimize”).
2. I have reviewed the foregoing Supplement to the Application of Telimize for Authorization to Obtain Numbering Resources, and the Exhibits thereto, and I am familiar with their contents.
3. To the best of my knowledge, information and belief, all statements in the application and the Exhibits thereto are true and accurate.

Executed on January 29, 2025

Grantham Hamm

Grantham Hamm
CEO
Telimize LLC