

June 10, 2025
Via ECFS**REDACTED - FOR PUBLIC INSPECTION**

Marlene H. Dortch, Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: Request for Confidential Treatment of Filing of E. Ritter Communications, LLC DBA Ritter Communications and DBA RightFiber; Supplement to the *Application of E. Ritter Communications, LLC DBA Ritter Communications and DBA RightFiber for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 25-154*

Dear Ms. Dortch,

Pursuant to Section §52.15(g)(3)(i) of the Commission's Rules,¹ E. Ritter Communications, LLC DBA Ritter Communications and DBA RightFiber ("Ritter Communications") hereby submits its supplement to the Application for Authorization ("Application") to Obtain Numbering Resources originally submitted on March 21, 2025 in the above mentioned docket number.

Ritter Communications respectfully requests that, pursuant to Sections §0.457 and §0.459 of the Commission's Rules,² the Commission withhold from public inspection and accord confidential treatment to **Exhibit A** to the supplement to the application because the documents contain sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").³ Moreover, Ritter Communications would suffer substantial competitive harm if this information were disclosed.

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

In support of this request, Ritter Communications hereby states the following:

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

Ritter Communications seeks confidential treatment of **Exhibit A** to the supplement to Application.

¹ 47 C.F.R. § 52.15(g).

² 47 C.F.R. § 0.457 & §0.459.

³ See 5 U.S.C. § 552(b)(4). Public disclosure is not required for "trade secrets and commercial or financial information obtained from a person and privileged or confidential."

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.

Ritter Communications is submitting as **Exhibit A** to the supplement to Application, additional information in compliance with §52.12(g)(3)(ii)(E).

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 Ritter Communications seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors". **Exhibit A** of the supplement to Application includes a Statement of Work and Master Service Agreement that are proprietary and confidential in nature and should not be disclosed to the public.

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

Exhibit A to the supplement of Application contains information relating to commercial matters which can be used by other interconnected VoIP providers to compromise Ritter Communications' position in the highly competitive interconnected VoIP business sector. Detailed operations and commercial information of the type provided by Ritter Communications could compromise Ritter Communications' position in this highly competitive industry. Accordingly, release of this information would result in substantial competitive harm to Ritter Communications.

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

Competitors could use Ritter Communications' proprietary commercial and operational information to Ritter Communications' detriment as they would gain access to sensitive information concerning Ritter Communications' commercial agreements, as well as information as to how Ritter Communications provides its services. Therefore, disclosure of the Statement of Work or Master Service Agreement would result in significant competitive harm to Ritter Communications. This information is not normally disclosed to the public.

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

Ritter Communications has not distributed the information in Exhibit A to the supplement to the Application 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.

Ritter Communications does not believe that the Statement of Work or Master Service Agreement is available to the public or that this information has ever been disclosed to third parties absent the protection of a non-disclosure agreement regarding their contents.

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

Ritter Communications requests that **Exhibit A** of the supplement to the application be withheld from public disclosure indefinitely. Disclosure of the Statement of Work or Master Service Agreement or their substance would cause competitive harm to Ritter Communications.

9. OTHER INFORMATION THAT RITTER COMMUNICATIONS BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.

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

For the foregoing reasons, Ritter Communications respectfully requests that Exhibit A to the supplement to the application be granted confidential status and withheld from public inspection.

Any questions you may have regarding this filing should be directed to my attention at 470-672-3933 or via email to nelson.fernandez@jsitel.com. Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez
Consultant

June 10 2025
Via ECFS

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

Re: Supplement to Application of E. Ritter Communications, LLC DBA Ritter Communications and DBA RightFiber for Authority to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 25-154

Dear Ms. Dortch:

On behalf of E. Ritter Communications, LLC DBA Ritter Communications and DBA RightFiber ("Ritter Communications"), I provide this supplemental information relevant to the application for authority to obtaining numbering resources ("Application") filed by Ritter Communications in the above-mentioned docket. Commission staff requested this information to augment and clarify the information Ritter Communications submitted as part of the Application.

1. Evidence of 911 and CALEA Compliance (§52.12(g)(3)(ii)(E))

In further support of showing its compliance with 911 and CALEA obligations Ritter Communications, hereby submits Exhibit A including additional information. Ritter Communications respectfully requests confidential treatment under the Commission's rules for this information.

2. Certification re Foreign Carriers

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

3. Declaration

A declaration under penalty of perjury pursuant to 47 C.F.R. §1.16 is attached hereto as Exhibit B. Please return the completed document to me in the self-addressed, stamped envelope provided for that purpose.

Marlene H. Dortch, Secretary
Federal Communications Commission
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Any questions you may have regarding this filing should be directed to my attention at 470-672-3933 or via email to nelson.fernandez@jsitel.com. Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez
Consultant

EXHIBIT A

(Confidential exhibit submitted separately)

EXHIBIT B

Verification

Verification

I swear, under penalty of perjury, that I am Lexanne Horton, an officer of the above-named applicant, E. Ritter Communications, LLC DBA Ritter Communications and DBA RightFiber and that I have examined the foregoing submission and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

A handwritten signature in black ink, appearing to read 'Lex Horton', written over a horizontal line.

Lexanne Horton
Chief Financial Officer