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June 23, 2022

Via ECFS Filing

**REDACTED FOR PUBLIC INSPECTION**

Secretary, Federal Communications Commission  
Washington, DC 20554  
Attn: Wireline Competition Bureau

**RE: Request for Confidential Treatment of Filing of IDT Domestic Telecom, Inc.; Supplemental Information for *Application of IDT Domestic Telecom, Inc. for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 21-470***

Dear Ms. Dortch,

Pursuant to Section §52.15(g)(3)(i) of the Commission's Rules,<sup>1</sup> IDT Domestic Telecom, Inc. ("IDT Domestic Telecom") hereby submits supplemental information to its Application for Authorization to Obtain Numbering Resources which addresses Commission staff's request for additional information regarding outbound interconnection and 911 compliance.

IDT Domestic Telecom respectfully requests that, pursuant to Sections §0.457 and §0.459 of the Commission's Rules,<sup>2</sup> the Commission withhold from public inspection and accord confidential treatment to supplemental information to the application which contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").<sup>3</sup> Moreover, IDT Domestic Telecom would suffer substantial competitive harm if this information were disclosed.

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

In support of this request, IDT Domestic Telecom hereby states the following:

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

IDT Domestic Telecom seeks confidential treatment of supplemental **Exhibit C** to its Application.

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

IDT Domestic Telecom is submitting as **Exhibit C** additional information as proof of IDT Domestic Telecom's facilities readiness as required by Section 52.15(g)(3)(i)(D) of the Commission's Rules.

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<sup>1</sup> 47 C.F.R. § 52.15(g).

<sup>2</sup> 47 C.F.R. § 0.457 & §0.459.

<sup>3</sup> 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."

**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 IDT Domestic Telecom seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors". **Exhibit C** describes and contains proprietary commercial information concerning IDT Domestic Telecom's network, customers, and services.

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

**Exhibit C** contains information relating to commercial matters which can be used by other interconnected VoIP providers to compromise IDT Domestic Telecom's position in the highly competitive interconnected VoIP business sector. Detailed operations and commercial information of the type provided by IDT Domestic Telecom could compromise IDT Domestic Telecom's position in this highly competitive industry. Accordingly, release of this information would result in substantial competitive harm to IDT Domestic Telecom.

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

Competitors could use IDT Domestic Telecom's proprietary commercial and operational information to IDT Domestic Telecom's detriment as they would gain access to sensitive information concerning IDT Domestic Telecom's commercial agreements, as well as information as to how IDT Domestic Telecom provides its services. Therefore, disclosure of the supplemental information would result in significant competitive harm to IDT Domestic Telecom's carrier partner. This information is not normally disclosed to the public.

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

IDT Domestic Telecom has not distributed the information in **Exhibit C** 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.**

IDT Domestic Telecom does not believe that the supplemental information is available to the public or that the 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.**

IDT Domestic Telecom requests that **Exhibit C** be withheld from public disclosure indefinitely. Any disclosure of IDT Domestic Telecom's information regarding its outbound interconnection and 911 compliance or their substance would cause competitive harm to IDT Domestic Telecom.

**9. OTHER INFORMATION THAT IDT DOMESTIC TELECOM BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.**

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

For the foregoing reasons, IDT Domestic Telecom respectfully requests the supplemental Exhibit C be granted confidential status and withheld from public inspection.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Carey Roesel

Carey Roesel  
Consultant

cc: Carl Billek - IDT  
tms: FCx2101d

CR/mp

## **Exhibit C**

### **IDT DOMESTIC TELECOM OUTBOUND INTERCONNECTION AND 911 COMPLIANCE**

**(Confidential exhibit submitted separately)**