



Potomac Law Group, PLLC
1300 Pennsylvania Avenue, NW, Suite 700
Washington, D.C. 20004
Telephone: (202) 204-3005
Fax: (202) 318-7707

March 5, 2018

PUBLIC VERSION –
CONFIDENTIAL INFORMATION REMOVED

VIA HAND DELIVERY

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

Re: Application of Number Access, LLC, For Authorization to Obtain Numbering Resources, Pursuant to Section 52.15(g), Docket No. 18-_____

Dear Ms. Dortch:

Pursuant to §52.15(g)(3)(i) of the Commission's Rules,¹ Number Access, LLC files its Application for Authorization to Obtain Numbering Resources. Please note, this Application contains confidential material, the disclosure of which would competitively harm the Company. Accordingly, Number Access requests this material be filed under seal, pursuant to §0.459 of the Commission's Rules.² In support of this request, Number Access submits the following:

1. Identification of the information for which confidential treatment is sought.

Number Access seeks confidential treatment of ***Exhibits A, B and C*** to its Application, and specific references to these exhibits found in the body of its Application.

2. Description of the circumstances giving rise to the submission.

As part of its Application, Number Access is including the agreement between its carrier partner as proof of its facilities readiness as required by §52.15(g)(3)(i)(D) of the

¹ 47 C.F.R. § 52.15(g).

² 47 C.F.R. § 0.459.

Marlene Dortch, Secretary
Federal Communications Commission
March 5, 2018

Page 2 of 3

Commission's Rules, and copies of a number of the carrier's interconnection agreements with incumbent carriers. In addition, Number Access is a privately-held company, and public disclosure information regarding its ownership would allow competitors insight into Number Access' financing that would cause unfair economic damage and could substantially harm Number Access.

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 Number Access seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors." The Exhibits to this Application describes the agreement between Number Access and its carrier partner and contains proprietary commercial information concerning Number Access's network, customers, financing, and services.

4. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*

The Exhibits contain information relating to commercial matters which can be used by other interconnected Voice over Internet Protocol ("VoIP") providers to compromise Number Access's position in the highly competitive interconnected VoIP sector. Accordingly, release of this information would result in substantial competitive harm to Number Access.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Competitors could use Number Access's proprietary commercial and operational information to Number Access's detriment as they would gain access to sensitive information concerning Number Access's commercial agreements, as well as information as to how Number Access provides its services. This information is not typically disclosed publicly.

6. *Identification of any measures taken to prevent unauthorized disclosure, or if the information has been disclosed previously.*

Neither Number Access nor its carrier-partner have distributed the information to the public or to any third party.

7. *Justification of the period during which Number Access asserts that material should not be available for public disclosure.*

Marlene Dortch, Secretary
Federal Communications Commission
March 5, 2018

Page 3 of 3

Number Access requests that the Exhibits be treated as confidential for a minimum period of ten years. This period is necessary due to the nature of the proprietary information in the Exhibits of the Application.

A non-public version of this Application with the confidential information included is being filed concurrently in-hand today.

Thank you for your assistance in this matter and please do not hesitate to contact me at (202) 792-6422, or kmarshall@potomaclaw.com if you have any questions or concerns.

Respectfully submitted,

A handwritten signature in blue ink that reads "Katherine E. Barker Marshall". The signature is fluid and cursive, with "Katherine" and "Barker" stacked above "E." and "Marshall".

Katherine Barker Marshall, Counsel to Number Access, LLC

cc: Christopher Finne, Number Access, LLC