



Google Voice Inc.
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650-253-0000
google.com

PUBLIC REDACTED VERSION

March 6, 2020

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Request for Confidential Treatment
Application of Google Voice Inc. for Authorization to Obtain Numbering Resources (WC Docket No. 20-_____)

Dear Ms. Dortch:

Google Voice Inc. (d/b/a “Google Voice for G Suite,” hereinafter “Google Voice”), pursuant to 5 U.S.C. § 552 and Sections 0.457 and 0.459 of the Commission’s Rules, 47 C.F.R. §§ 0.457, 0.459, hereby requests that certain information complementary to its above-referenced Application to Obtain Numbering Resources (“Application”) be treated as confidential and not subject to public inspection. The designated information constitutes confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm. As described below, Google Voice’s request satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission’s Rules.

In accordance with Section 0.459(b) and in support of this request, Google Voice provides the following information:

1. Identification of the Information for Which Confidential Treatment is Sought:

Google Voice’s request for confidential treatment is limited to the confidential Exhibits to its Application.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

The confidential Exhibits are being submitted to the Commission as proof of facilities

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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.

The information for which Google Voice seeks confidential treatment contains sensitive commercial, financial, and technical information "which would customarily be guarded from competitors."¹ The confidential Exhibits contain trade secrets and proprietary commercial and technical information relating to the manner in which Google Voice and its carrier partner conduct network operations.

4. Explanation of the degree to which the information concerns a service that is competitive.

The confidential Exhibits provide detailed information relating to commercial and operational matters that could be used by competitors to the disadvantage of Google Voice. Disclosure of Google Voice's confidential information would cause substantial competitive harm.

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

Competitors could use the information in the confidential Exhibits to Google Voice's detriment as they would gain access to sensitive and proprietary information about how Google Voice provides services as well as about Google Voice's commercial agreements with others that are not ordinarily disclosed to the public.

6. Identification of any measures taken by the requesting party to prevent unauthorized disclosure.

Google Voice has taken steps to keep confidential the information set forth in the confidential Exhibits by limiting the number of people involved to only those on a "need to know" basis, and by requiring any third parties involved to execute robust nondisclosure agreements.

7. Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties.

The information contained in the confidential Exhibit is not available to the public, and has only been disclosed to third parties pursuant to restrictive safeguards.

Google Voice voluntarily provides the information to the Commission at this time with the expectation that it will be treated confidentially in accordance with the Commission's rules. See *Critical Mass Energy Project v. Nuclear Regulatory*

¹ 47 C.F.R. § 0.457.

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Comm'n, 975 F.2d 871, 879 (D.C. Cir. 1992) (commercial information provided on a voluntary basis "is 'confidential' for the purpose of Freedom of Information Act (FOIA) Exemption 4 if it is of a kind that would customarily not be released to the public by the person from whom it was obtained.").

8. Justification of the requested period of confidentiality.

Google Voice requests that the confidential Exhibits be treated as confidential for a period of ten years. This period is necessary due to the sensitive nature of the information in the confidential Exhibits.

9. Any other information that would be useful in assessing whether this request should be submitted.

The information subject to this request for confidentiality should not be made available for public disclosure at any time. There is nothing material that public review of this information would add to the Commission's analysis of Google Voice's request for an experimental authorization.

Moreover, public disclosure of the sensitive information in the confidential Exhibits after the Commission has ruled on the Request for Confidentiality is not necessary for the Commission to fulfill its regulatory responsibilities.

Consistent with 47 C.F.R. § 0.459(d)(l), Google Voice requests notification if release of the information subject to this request is requested pursuant to the FOIA or otherwise, so that Google Voice may have an opportunity to oppose grant of any such request.

Respectfully submitted,



Darah Franklin
Counsel
Google LLC

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Google Voice Inc. Applicant

WC Docket No. 20-_____

For Authorization to Obtain Numbering
Resources Pursuant to Section 52.15(g) of
the Commission's Rules

**APPLICATION OF GOOGLE VOICE INC.
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

Google Voice Inc. (d/b/a “Google Voice for G Suite,” hereinafter “Google Voice”) hereby files this application with the Federal Communications Commission (the “Commission”) for authorization to acquire telephone numbers directly from the North American Numbering Plan Administrator and the Pooling Administrator (the “Numbering Administrators”) pursuant to Commission rule section 52.15(g)(3).¹

As set forth in the Commission’s Numbering Order,² an interconnected VoIP provider³ may obtain numbering resources from the Numbering Administrators upon 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 in Sections 52.15(g)(3)(i)(A)-(F) of the

¹ 47 C.F.R. § 52.15(g)(3).

² *In the Matter of Numbering Policies for Modern Communications*, 30 FCC Rcd. 6839 (2015).

³ Google Voice for G Suite will be capable of providing interconnected VoIP service within 60 days of the numbering resources activation date as required by 47 C.F.R. § 52.15(g)(2).

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Commission's Rules. Google Voice hereby requests the Commission grant it the authorization.

Google Voice provides the following information in support of its application:

I. Information Required by Section 52.15(g)(3)(i)

A. § 52.15(g)(3)(i)(A)

Name: Google Voice Inc.
Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043
Telephone: 650-253-0000

For purposes of this application, inquiries pertaining to issues associated with 911, law enforcement, and general compliance with Commission rules can be directed to:

Name: Devin Morris
Title: Compliance Officer
Telephone: 720-546-6384
Email: devinmorris@google.com

B. § 52.15(g)(3)(i)(B)

Google Voice 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, numbering authority delegated to the states, and industry guidelines and practices regarding numbering as applicable to telecommunications carriers.

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C. § 52.15(g)(3)(i)(C)

Google Voice acknowledges that it must file requests for numbers with the relevant state commissions at least 30 days before requesting numbers from the Numbering Administrators.

D. § 52.15(g)(3)(i)(D)

Google Voice sets forth its capability to provide service within 60 days of the numbering activation date. Google Voice has an agreement in place with its carrier partner who in turn has interconnection agreements in effect with the relevant local exchange carriers, as well as full staff for number porting. As proof of its facilities readiness, Google Voice has attached to this application a letter confirming an agreement between Google Voice and its carrier partner (Confidential Exhibit A) and the relevant portions of an interconnection agreement between that carrier partner and a local exchange carrier (Confidential Exhibit B), both submitted pursuant to Google Voice's concurrently filed request for confidential treatment.

E. § 52.15(g)(3)(i)(E)

Google Voice certifies that it complies 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.

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F. § 52.15(g)(3)(i)(F)

Google Voice certifies that it possesses the financial, managerial, and technical expertise to provide reliable service. For purposes of this application, inquiries pertaining to financial, managerial, and technical issues can be directed to:

Name: Devin Morris
Title: Compliance Officer
Telephone: 720-546-6384
Email: devinmorris@google.com

Google Voice states that none of the identified personnel is being or has 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)

Google Voice 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 1988.⁴

II. Acknowledgement of Conditions in Section 52.15(g)(3)(iv)

As required by Section 52.15(g)(3)(iv), Google Voice will maintain the accuracy of all contact information and certifications in the application and will file a correction with the Commission and each applicable state within 30 days of any changes. Google Voice will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

⁴ See 21 U.S.C. § 862.

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III. Conclusion

Pursuant to Section 52.15(g)(3) of the Commission's Rules, Google Voice respectfully requests the Commission grant this application for authorization to obtain numbering resources.



Darah Franklin
Counsel
Google LLC

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Exhibit A

[REDACTED]

Exhibit B

[REDACTED]