

June 23, 2017

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Request for Confidential Treatment of Filing of BlulP Inc.;  
*Application of BlulP Inc. for Authorization to Obtain Numbering Resources Pursuant to  
Section 52.15(g) of the Commission's Rules, WC Docket No. 17-***

Dear Ms. Dortch:

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, BlulP Inc. ("BlulP") hereby submits its application requesting authorization to obtain numbering resources.

BlulP respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457 and 0.459, the Commission withhold from public inspection and accord confidential treatment to certain information within the application, including **Exhibits B and C**, because those documents contain sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").<sup>1</sup> BlulP is voluntarily providing this information, which is "of a kind that would not customarily be released to the public"; therefore, this information is "confidential" under FOIA.<sup>2</sup> Moreover, BlulP would suffer substantial competitive harm if this information were disclosed.<sup>3</sup>

Exhibit [ ] is accordingly marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT – NOT FOR PUBLIC INSPECTION."

In support of this request and pursuant to Section 0.459(b) of the Commission's Rules,<sup>4</sup> BlulP hereby states as follows:

**1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT.<sup>5</sup>**

BlulP seeks confidential treatment of certain text and Exhibits B and C to the enclosed application.

**2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.<sup>6</sup>**

BlulP is submitting as Exhibits B and C the agreements between it and its carrier partners, as proof of BlulP'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> 5 U.S.C. § 552(b)(4).

<sup>2</sup> See *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

<sup>3</sup> See *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

<sup>4</sup> 47 C.F.R. § 0.459(b)

<sup>5</sup> 47 C.F.R. § 0.459(b)(1).

<sup>6</sup> 47 C.F.R. § 0.459(b)(2).

**3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED.<sup>7</sup>**

The information for which BlulP seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors."<sup>8</sup> Exhibits B and C contain confidential agreements between BlulP and its carrier partners and contains proprietary commercial information concerning BlulP's network, customers, and services.

**4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERN'S A SERVICE THAT IS SUBJECT TO COMPETITION.<sup>9</sup>**

Exhibits B and C and certain text in the application contain information relating to commercial matters that could be used by competitors to BlulP's disadvantage. BlulP has numerous competitors in the Voice over Internet Protocol ("VoIP") and managed services sector in which it operates. Detailed operations and commercial information of the type provided by BlulP could compromise BlulP's position in this highly competitive industry. Release would therefore result in substantial competitive harm to BlulP.

**5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.<sup>10</sup>**

Competitors could use BlulP's proprietary commercial and operational information to BlulP's detriment as they would gain access to sensitive information about how BlulP provides services as well as about BlulP's commercial agreements with others in the market that are not normally disclosed to the public.

**6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.<sup>11</sup>**

BlulP has not distributed the redacted information in the text of the application and Exhibits B and 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.<sup>12</sup>**

BlulP has not previously disclosed the information in the text of the application and in Exhibits B and C.

**8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE.<sup>13</sup>**

BlulP requests that the redacted information in the text of the application and Exhibit B and C be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information in Exhibits B and C.

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<sup>7</sup> 47 C.F.R. § 0.459(b)(3).

<sup>8</sup> 47 C.F.R. § 0.457(d)(2).

<sup>9</sup> 47 C.F.R. § 0.459(b)(4).

<sup>10</sup> 47 C.F.R. § 0.459(b)(5).

<sup>11</sup> 47 C.F.R. § 0.459(b)(6).

<sup>12</sup> 47 C.F.R. § 0.459(b)(7).

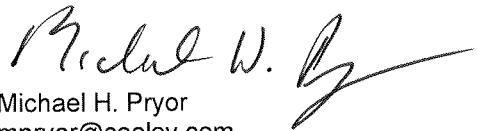
<sup>13</sup> 47 C.F.R. § 0.459(b)(8).

**9. OTHER INFORMATION THAT BluIP BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.<sup>14</sup>**

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

Any questions you may have regarding this filing should be directed to my attention via email. Thank you for your assistance in this matter.

Respectfully submitted,



Michael H. Pryor  
mpryor@cooley.com

MHP:rkk

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<sup>14</sup> 47 C.F.R. § 0.459(b)(9).

**REDACTED FOR PUBLIC INSPECTION**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

*In the Matter of* )  
 )  
BLuIP Inc. ) WC Docket No. 17-\_\_\_\_\_  
 )  
 )  
For Authorization to Obtain Numbering )  
Resources Pursuant to Section 52.15(g) of )  
the Commission's Rules )

**APPLICATION OF BLUIP INC. FOR AUTHORIZATION TO  
OBTAIN NUMBERING RESOURCES**

BluIP Inc. (“BluIP”), pursuant to Section 52.15(g)(3) of the Federal Communications Commission’s (“Commission”) Rules, respectfully requests authorization to obtain numbering resources as described below.<sup>15</sup>

As set forth in the Commission’s *Numbering Order*,<sup>16</sup> an interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon a 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 detailed in Sections 52.15(g) (3)(i)(A)-(F) of the Commission’s Rules. BluIP hereby requests that the Commission grant it that authorization. In support of this application, BluIP provides the following information:

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<sup>15</sup> 47 C.F.R. § 52.15(g)(3).

<sup>16</sup> *Numbering Policies for Modern Communications*, Report and Order, 30 FCC Rcd 6839 (2015).

**I. INFORMATION REQUIRED BY SECTION 52.15(g) (3)(i)**

**(A) §52.15(g)(3)(i)(A)**

**Name:** BluIP Inc.  
**Address:** 410 S. Rampart, Suite 460  
Las Vegas, NV 89145  
**Telephone:** 702-690-4400  
**Qualified Personnel:** Edwin Martirosyan, Chief Technical Officer  
Steve Lance, Director of Operations

BluIP's IPES OCN is 819H.

**(B) §52.15(g)(3)(i)(B)**

BluIP hereby 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 as well as to the numbering authority delegated to the states.

BluIP hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, just as to telecommunications carriers.

**(C) §52.15(g)(3)(i)(C)**

BluIP hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators. The list of states in which BluIP intends to request numbers is set forth in Exhibit 1 of this application.

**(D) §52.15(g)(3)(i)(D)**

BluIP already has in place the necessary procedures to enable it to place numbers into service within 60 days of activation. BluIP, which has been in business since 2011, offers interconnected VoIP and advanced telephony solutions such as Hosted PBX, cloud-based managed communications services, and SIP trunking to SMBs and enterprise customers. BluIP

currently utilizes more than [REDACTED] numbers and serves some [REDACTED] customers. BluIP has entered into agreements with carriers and other providers, including [REDACTED] [REDACTED] to provide for routing of calls to and from the PSTN, emergency 911 calling, and the routing of calls to 711 and other specialized dialing patterns. As an example of such agreements, attached hereto at Exhibit B is a copy of BluIP's voice termination agreement with [REDACTED]. BluIP has requested confidential treatment of this agreement. BluIP has also entered into IP-to-IP interconnection agreements with several carriers. BluIP will continue to utilize these agreements to route outgoing calls to the PSTN.

To ensure routing of calls to numbers that BluIP will obtain directly, BluIP has entered into a further agreement with [REDACTED], which will host location routing numbers on its switch and ensure the proper routing of calls to BluIP's customers. This and related [REDACTED] agreements are attached at Exhibit C. BluIP has also requested confidential treatment of this agreement. BluIP also has the expertise and back office tools and systems in place to enable number porting and has, with its carrier partners, successfully ported thousands of numbers, including bulk ports of over 1000 numbers each.

(E) §52.15(g)(3)(i)(E)

BluIP hereby 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, 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR Part 9.

(F) §52.15(g)(3)(i)(F)

BluIP hereby certifies that it has the financial, managerial, and technical expertise to provide reliable service. As noted above, BluIP was founded in 2011 and today serves more than [REDACTED] customers and has assigned more than [REDACTED] telephone numbers utilizing its carrier partners. BluIP's founders and key employees collectively have more than 50 years of experience in telecommunications. The co-founders of the company each have more than 15 years of experience in telecom and IT industries. BluIP's Vice President of Engineering has over 24 years of experience with long distance, CLEC, and wireless companies, in which he has held senior engineering positions. The company has received numerous awards for its services, including recently being named one of the top 10 VoIP solution providers by Enterprise Magazine and for providing the Internet Telephony product of the year by TMC's Internet Telephony Magazine. The company is privately held and cash-flow positive. Key managerial and technical personnel are identified below.

**Key Personnel:** Armen Martirosyan, Chief Executive Officer

Edwin Martirosyan, Chief Technical Officer

Patrick Case, Vice President of Engineering

(G) §52.15(g)(3)(i)(G)

BluIP hereby 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, 21 U.S.C. § 862.

## **II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)**

As required by Section 52.15(g)(3)(iv), BluIP will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within 30 days of any changes. BluIP will also furnish accurate

regulatory and numbering contact information to each state commission when requesting numbers in that state.

### **III. CONCLUSION**

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

Respectfully submitted,



Armen Martirosyan  
Chief Executive Officer, BluIP, Inc.

Michael Pryor  
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Suite 700  
Washington, D.C. 20004  
(202) 776-2339  
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Counsel to BluIP

**EXHIBIT A**

**STATES IN WHICH BLUIP INTENDS TO OBTAIN NUMBERS**

BluIP intends to request numbers in the following states:

California

Florida

Illinois

Nevada

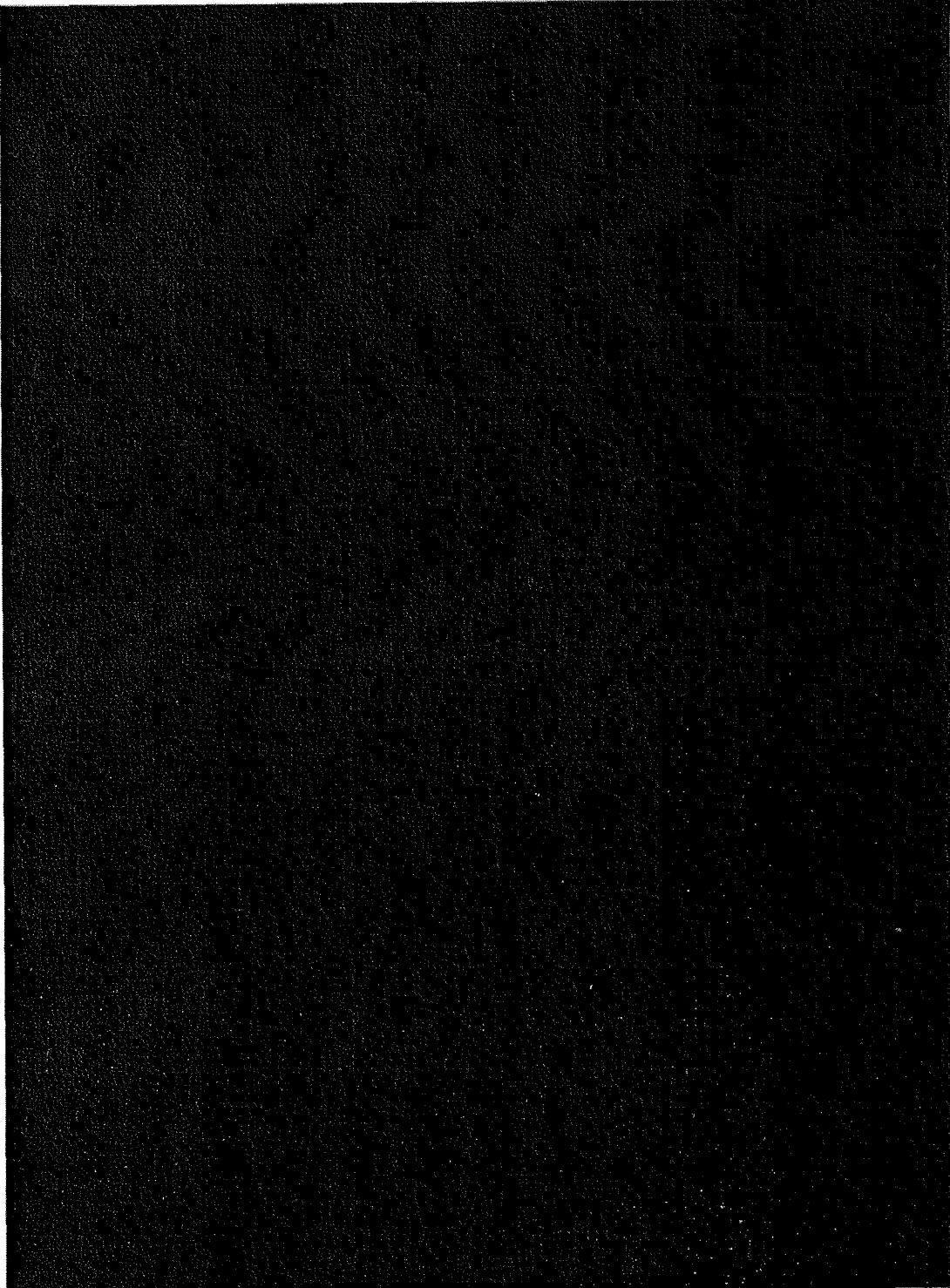
Texas

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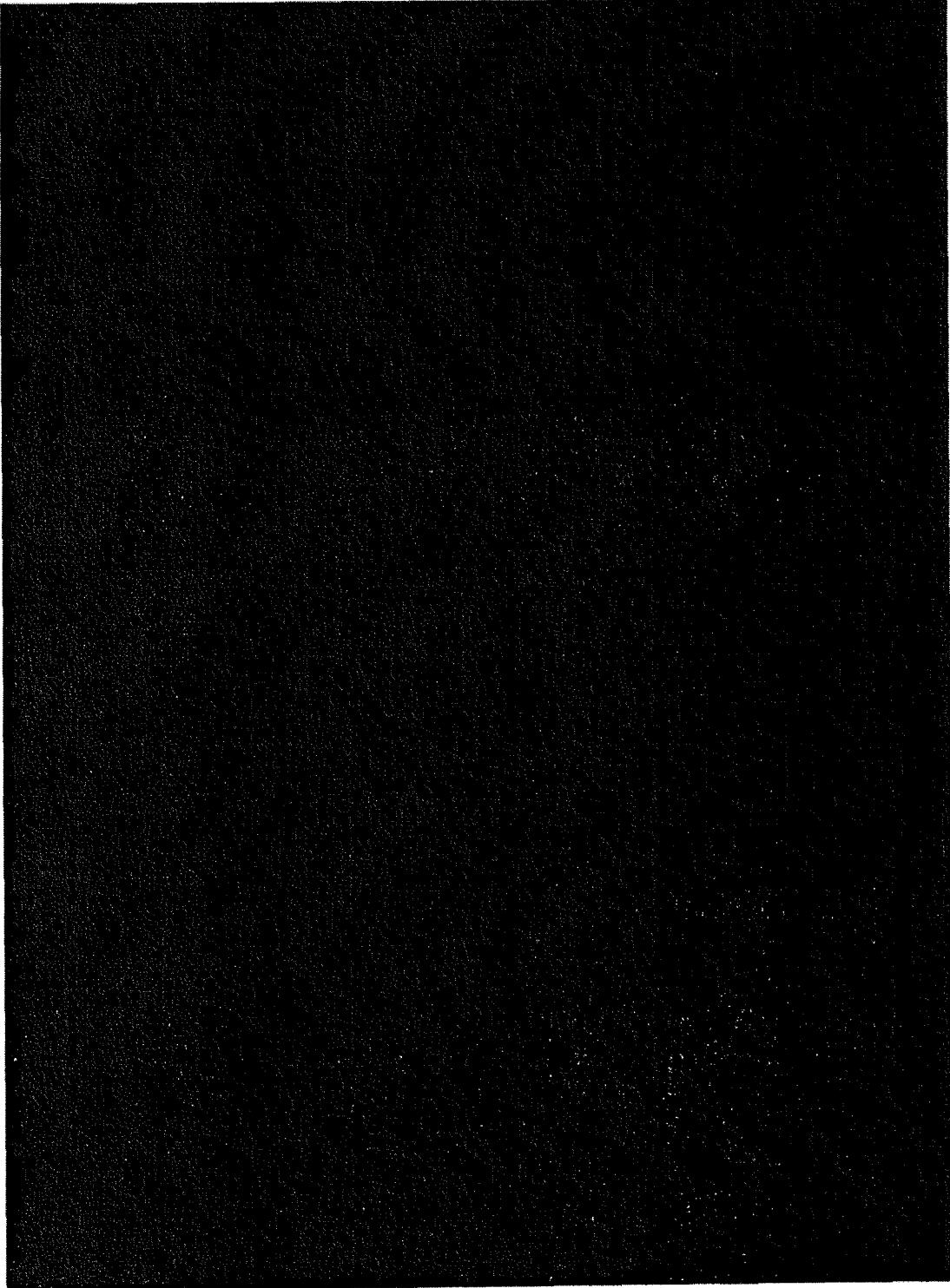
**EXHIBIT B**

**Voice Termination Agreement**

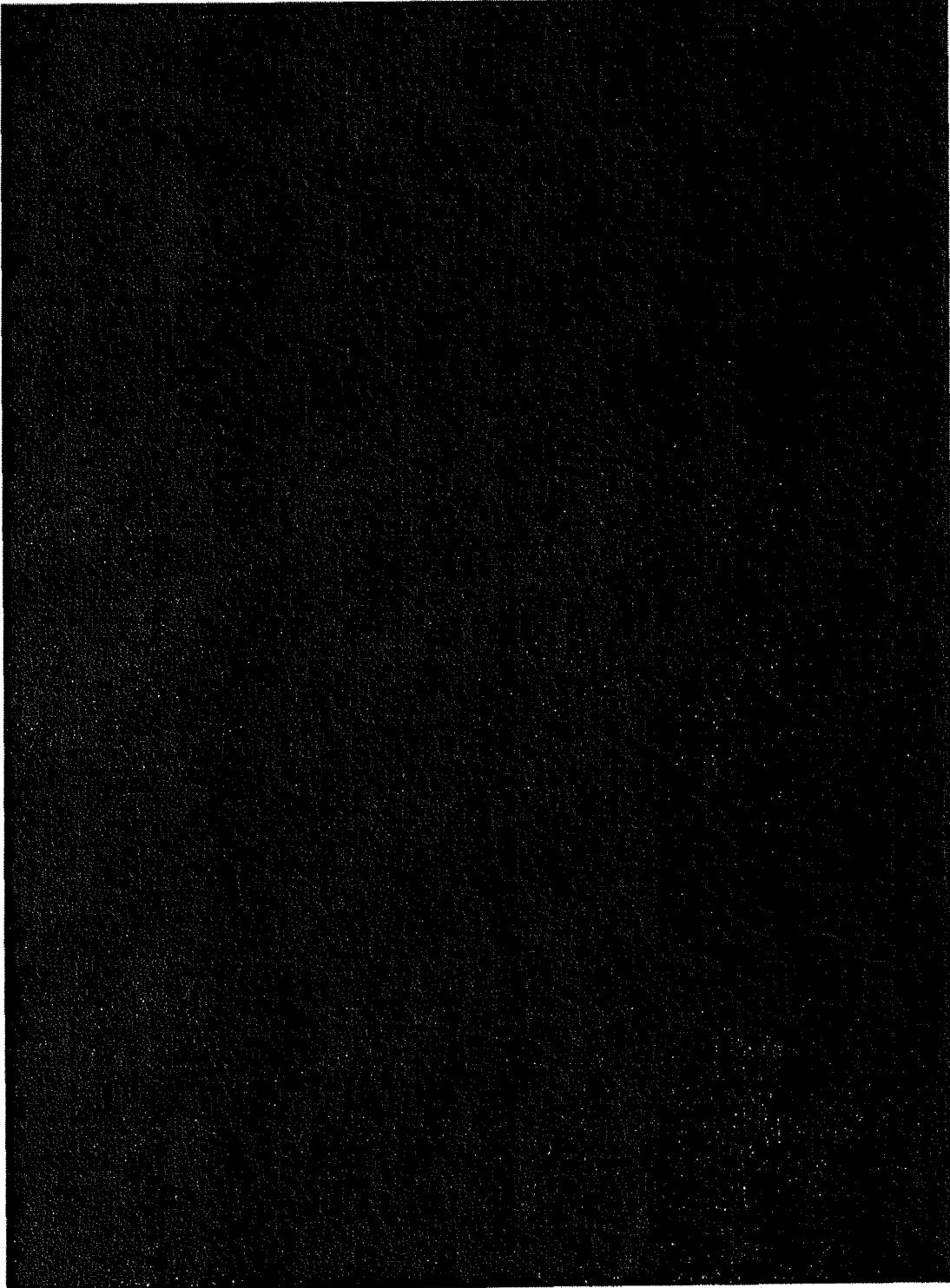
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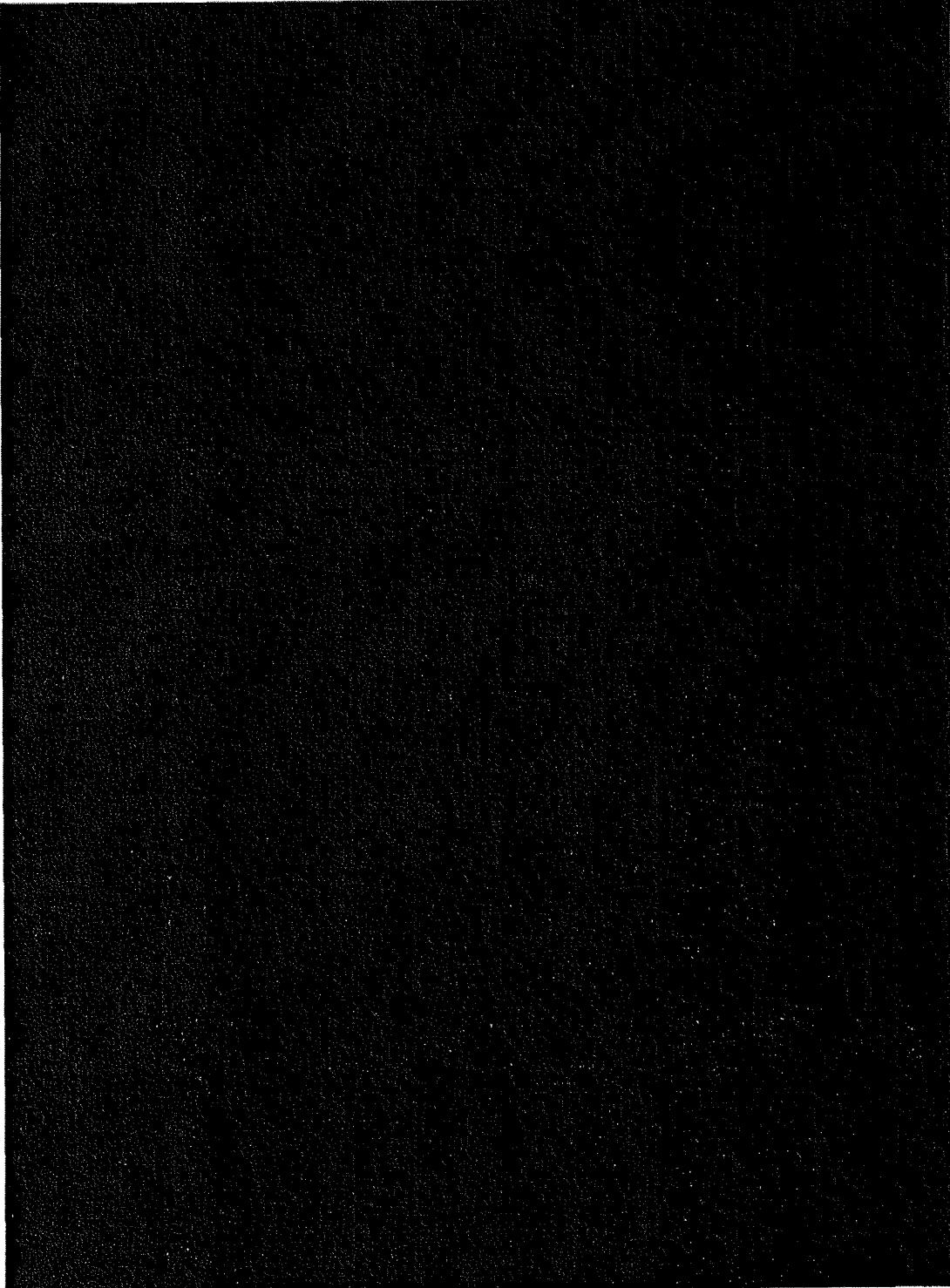
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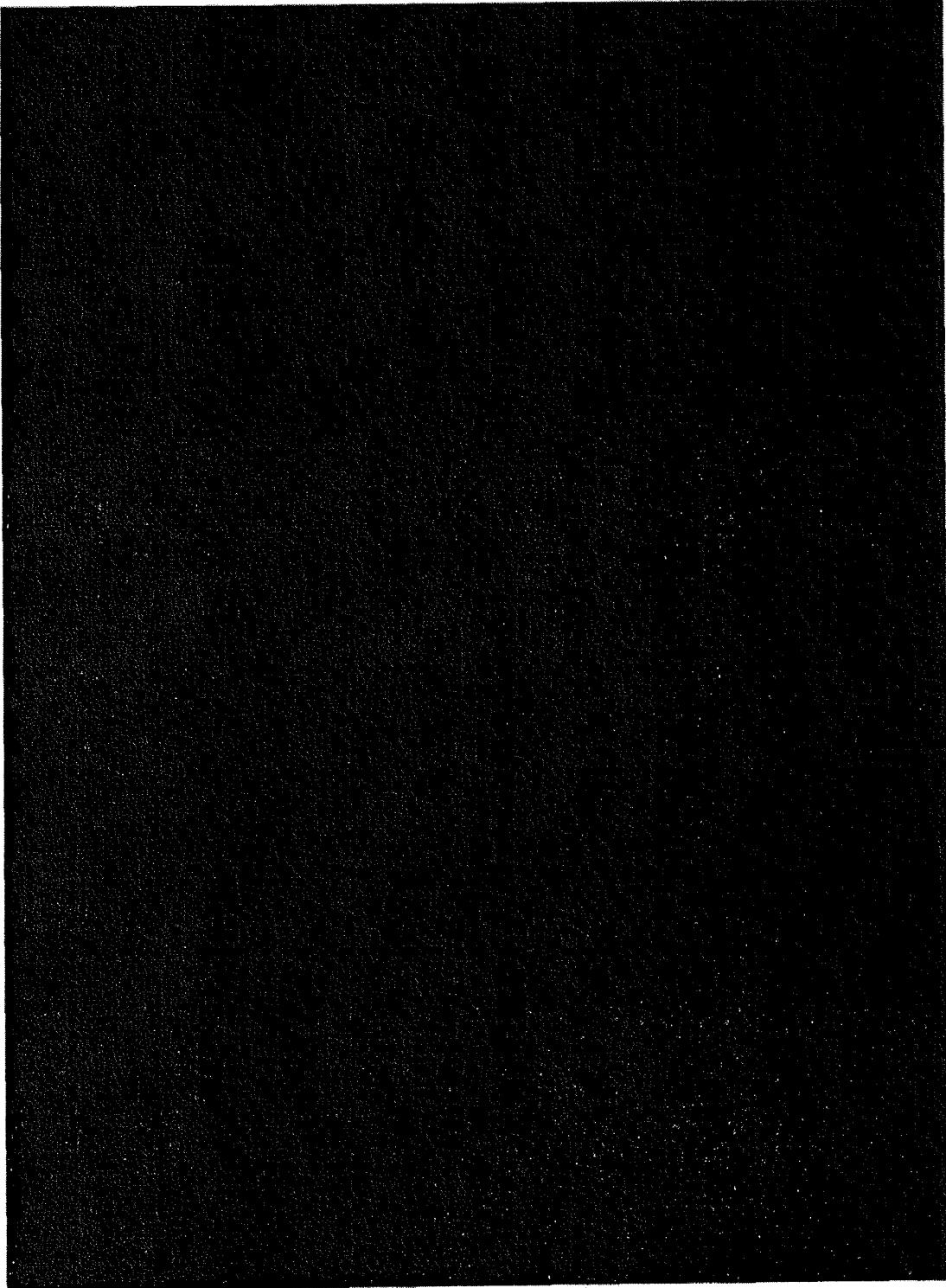
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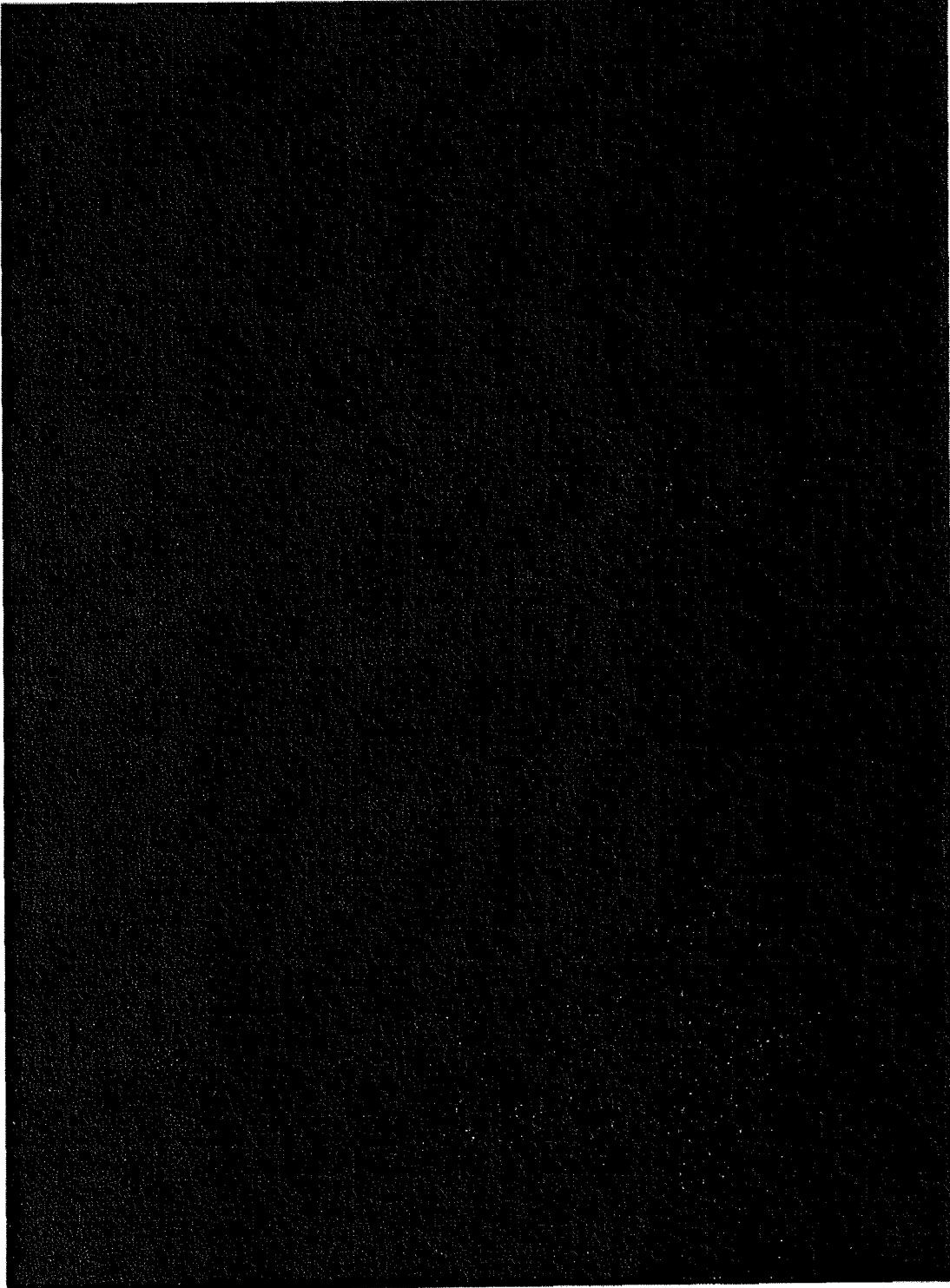


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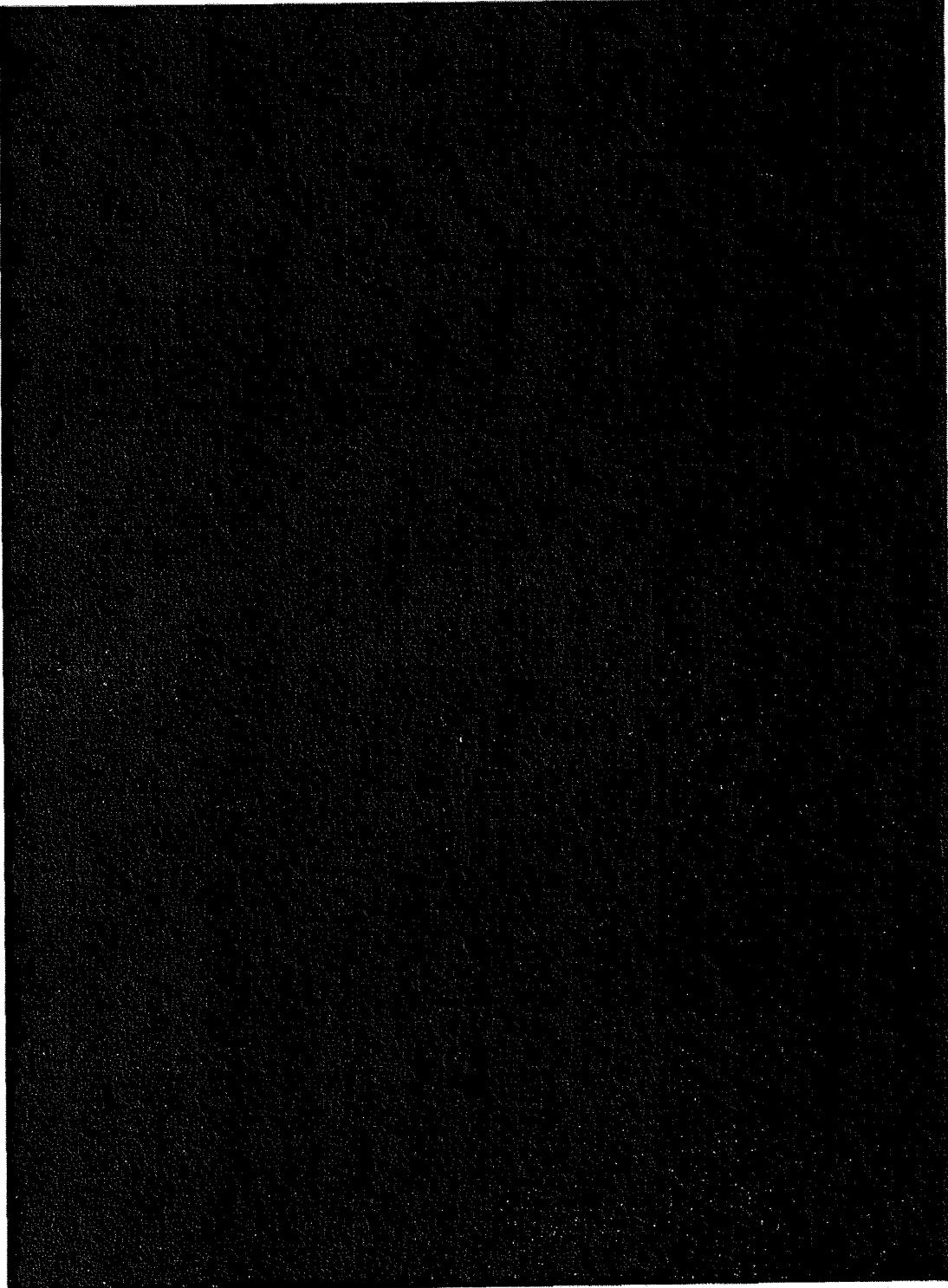
**EXHIBIT C**

**Agreement between BluIP, Inc. and its Carrier Partner to Host Numbers and Route Calls**

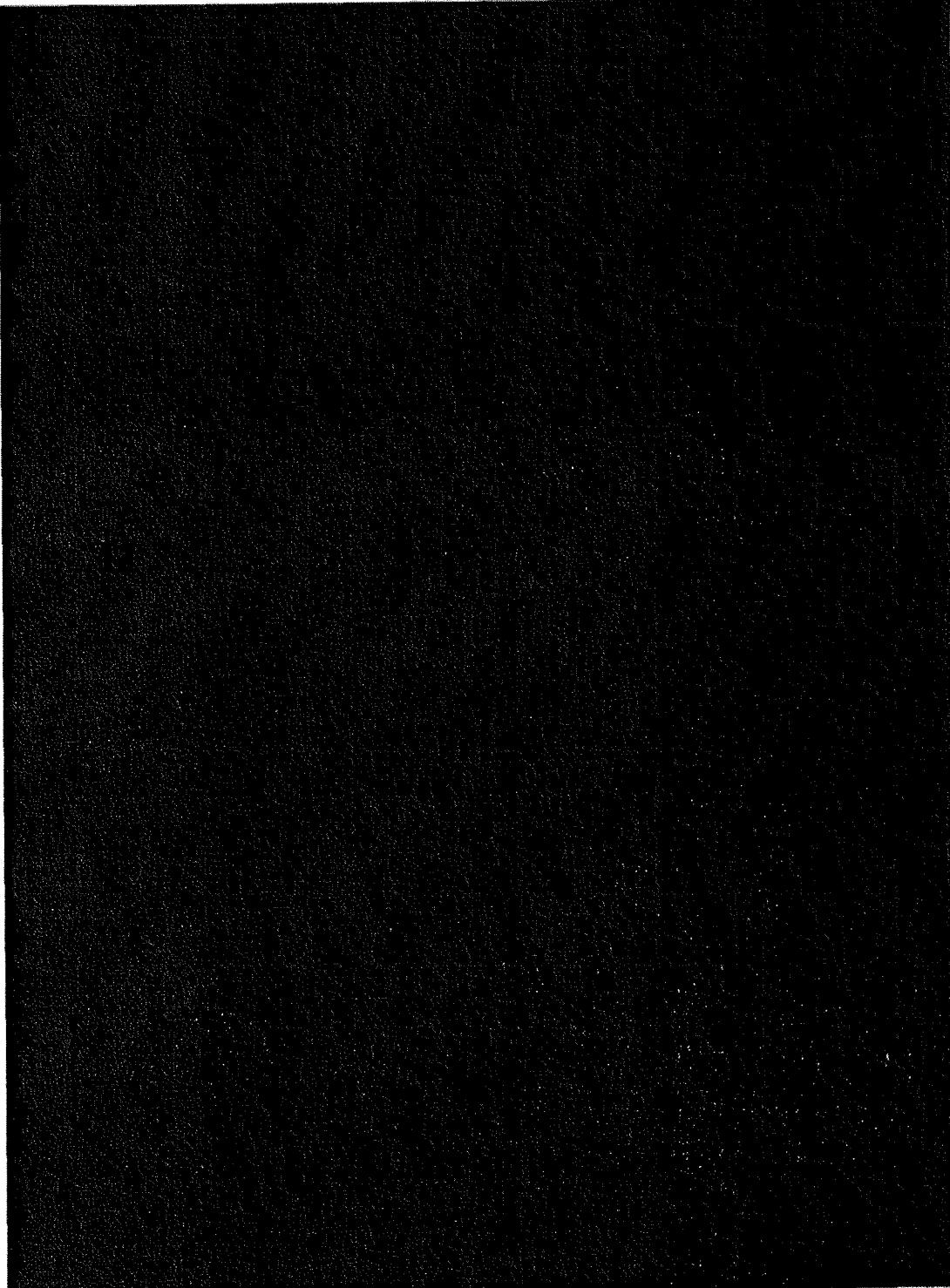
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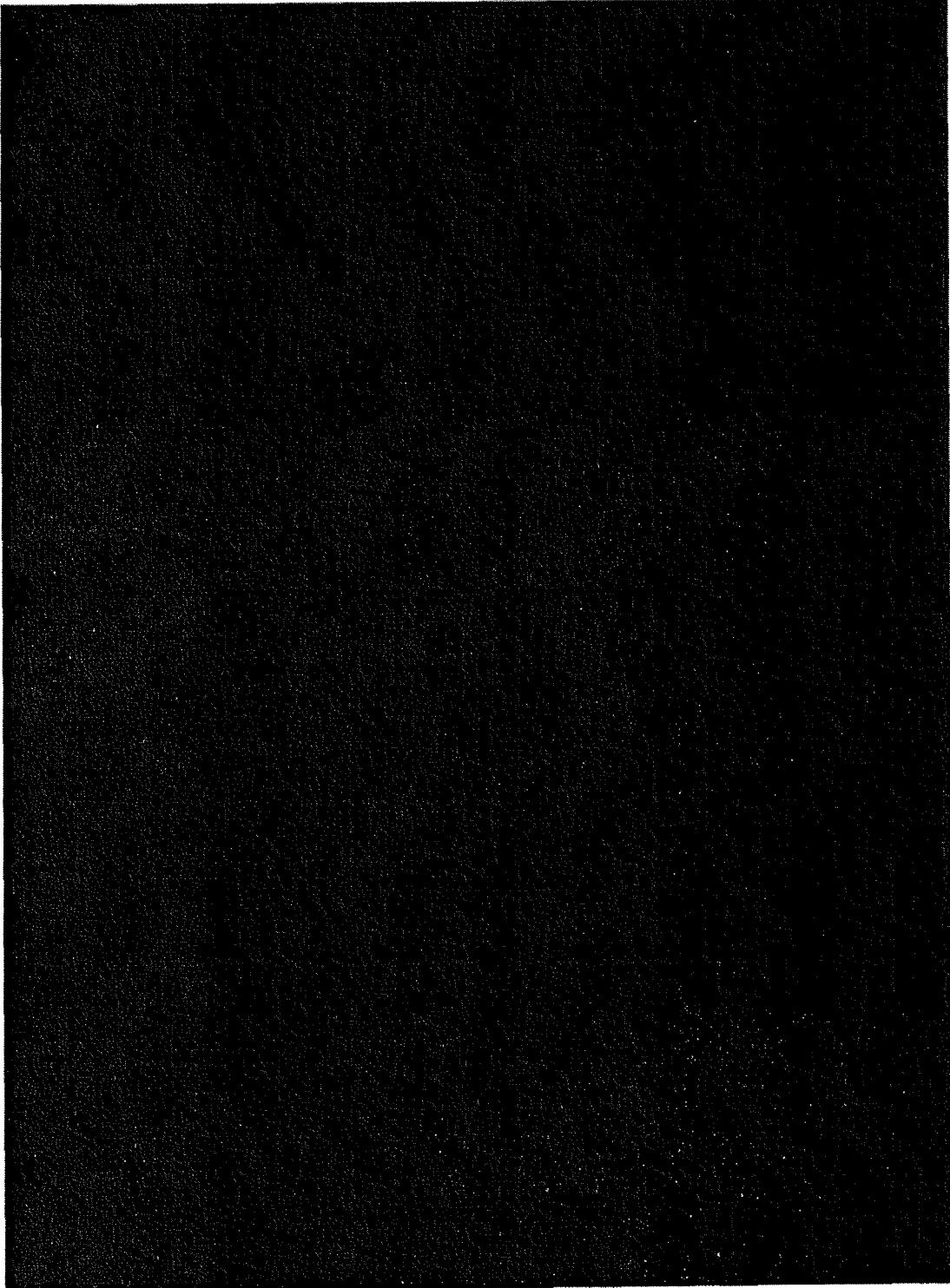
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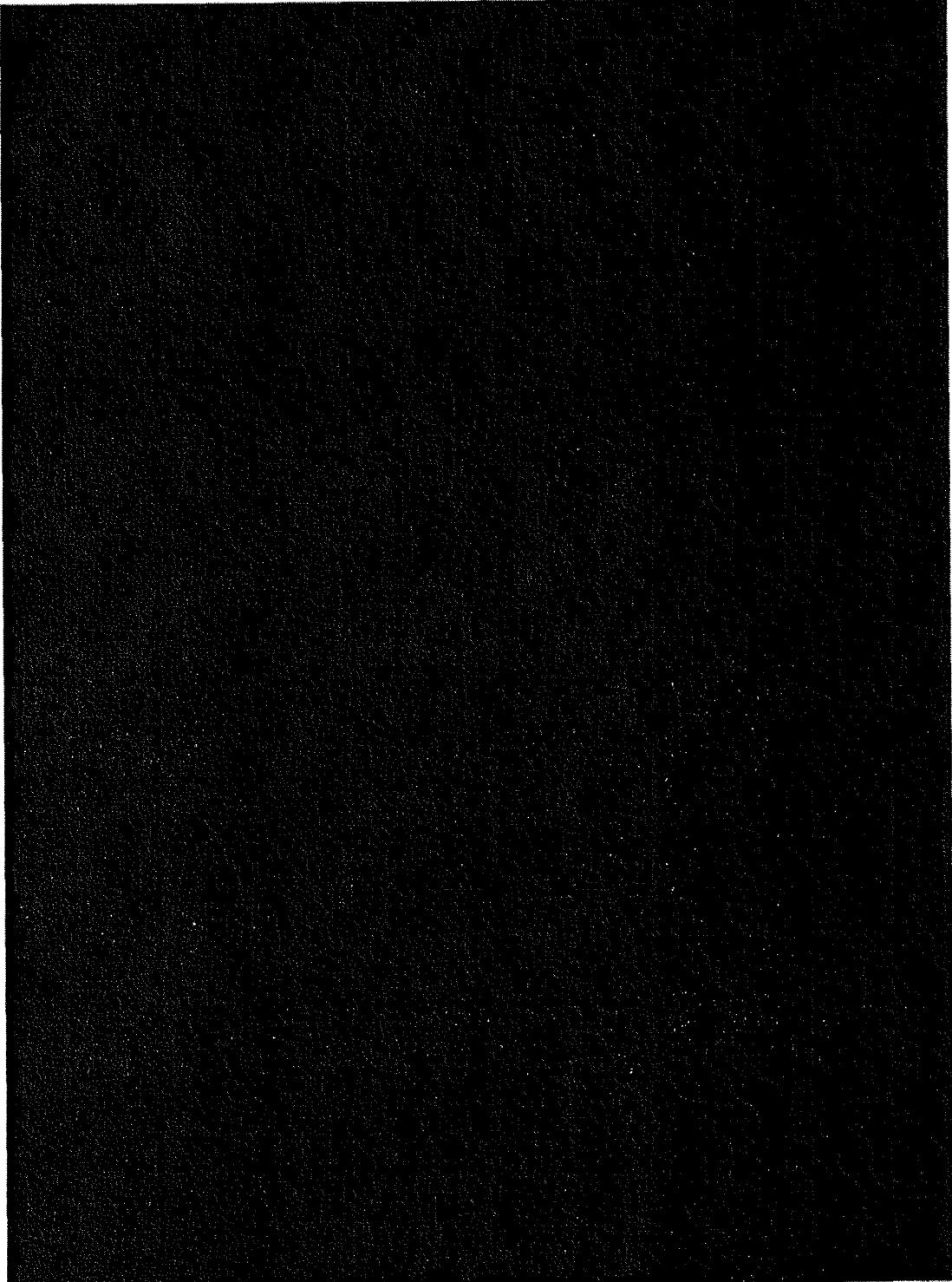
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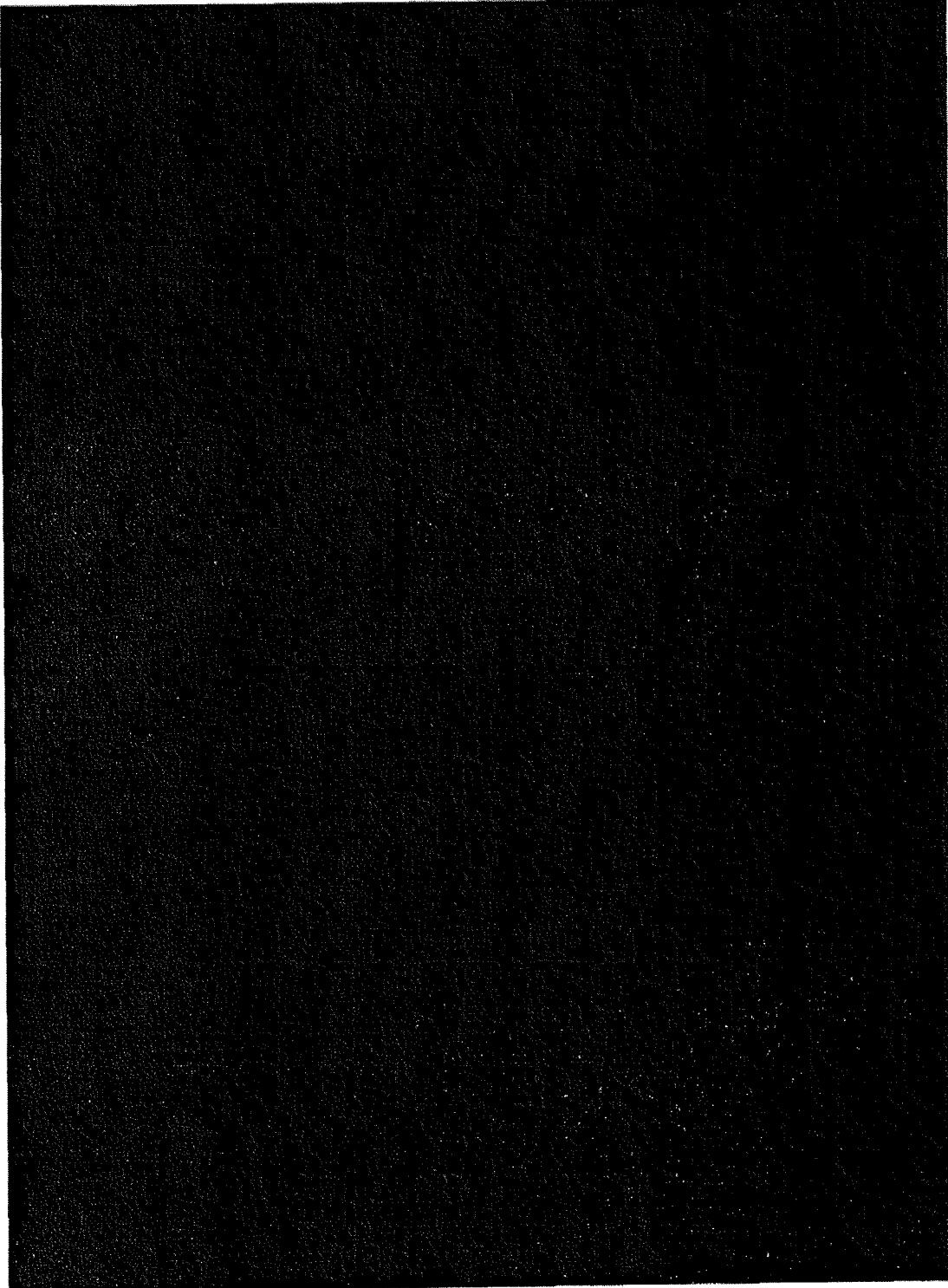
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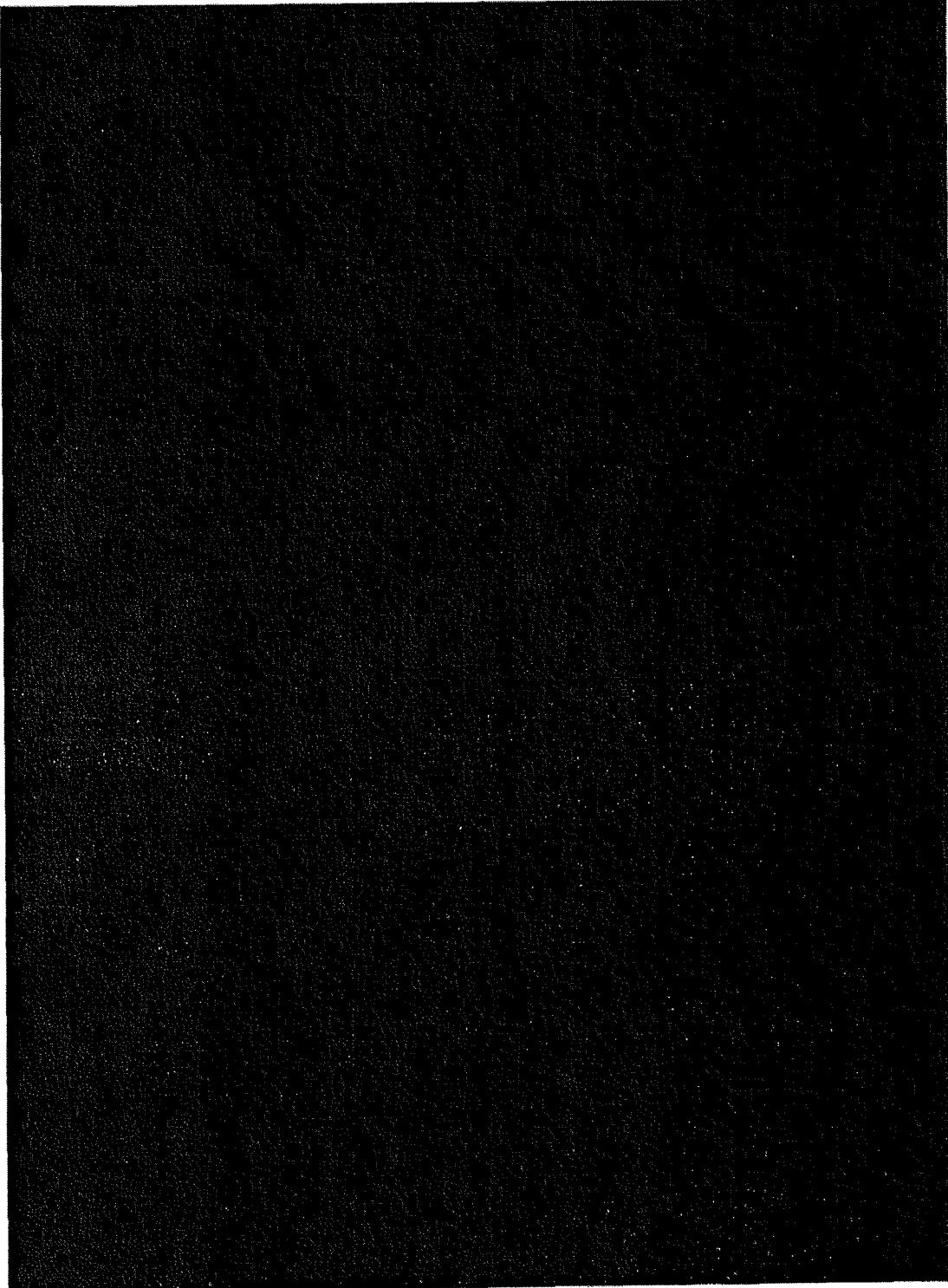
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