

July 15, 2021
Via ECFS Filing

REDACTED FOR PUBLIC INSPECTION

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

RE: Request for Confidential Treatment of Filing of Intrado IP Communications, Inc.; **Supplemental Information to *Application of Intrado IP Communications, Inc. for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 21-179***

Dear Ms. Dortch:

Pursuant to Section §52.15(g)(3)(i) of the Commission's Rules,¹ Intrado IP Communications, Inc. ("Intrado IP") hereby submits supplemental information to its Application for Authorization to Obtain Numbering Resources originally filed in the above-mentioned docket number based upon correspondence with staff.

Intrado IP 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 the attached **Exhibit A**, which supplements the application, because this document contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").³ Moreover, Intrado IP would suffer substantial competitive harm if this information were disclosed.

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

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."

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, Intrado IP hereby states as follows:

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

Intrado IP seeks confidential treatment of **Exhibit A** to its Application.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.

Intrado IP is submitting as Exhibit A the agreement between it and its carrier partner, as proof of Intrado IP's facilities 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 Intrado IP seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors". Exhibit A describes the agreement between Intrado IP and its carrier partner and contains proprietary commercial information concerning Intrado IP's network, customers, and services.

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

Exhibit A contains information relating to commercial matters that could be used by competitors to Intrado IP's disadvantage. Intrado IP has numerous competitors in the Voice over Internet Protocol ("VoIP") services sector in which it operates. Detailed operations and commercial information of the type provided by Intrado IP could compromise Intrado IP's position in this highly competitive industry. Release would therefore result in substantial competitive harm to Intrado IP.

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

Competitors could use Intrado IP's proprietary commercial and operational information to Intrado IP's detriment as they would gain access to sensitive information concerning Intrado IP's commercial agreements, as well as information as to how Intrado IP provides its services. The prices and terms for the provision of such services are a substantial differentiator between competing carriers. Therefore, disclosure of the Carrier Agreements would result in significant competitive harm to Intrado IP'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.

Intrado IP has not distributed the information in **Exhibit A** to the public; Intrado IP is prohibited by contract from publicly disclosing the Carrier Agreements, except as expressly authorized by the carrier partner.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES.

Intrado IP does not believe that the Carrier Agreement is available to the public or that the Carrier Agreement 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.

Intrado IP requests that **Exhibit A** be withheld from public disclosure indefinitely. Intrado IP and its carrier partner intend for the Carrier Agreement to remain in effect indefinitely and therefore any disclosure of the Carrier Agreement or their substance would cause competitive harm to Intrado IP's carrier partner regarding of the timing of the disclosure.

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9. **OTHER INFORMATION THAT INTRADO IP BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.**

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

For the foregoing reasons, Intrado IP respectfully requests the Carrier Agreement be granted confidential status and withheld from public inspection.

A copy of the Confidential version of this filing has been emailed to assigned FCC staff.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

cc: Sean Ward - Intrado IP
tms: FCx2101a

ST/mp

Exhibit A

AGREEMENTS BETWEEN INTRADO IP COMMUNICATIONS, INC.

AND CARRIER PARTNER

(Confidential exhibit submitted separately)