

Compliance Solutions, Inc.

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March 30, 2021

Via ECFS Filing

REDACTED FOR PUBLIC INSPECTION

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

RE: Request for Confidential Treatment to Application of Cedar Wireless, Inc. for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of the Commission's Rules

Dear Ms. Dortch,

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, Cedar Wireless, Inc.; here forward known as ("Cedar Wireless") hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

Cedar Wireless 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, Exhibit A and Exhibit B to this application in their entirety as confidential because the documents contain trade secrets and commercially sensitive "Pricing" information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). The information in Exhibit A and Exhibit Bare "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. Cedar Wireless respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibit A and Exhibit B are accordingly marked with "Confidential and Proprietary – Filed Under Seal Pursuant to 47 C.F.R. §0.459."

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

1. SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT PURSUANT TO 47 CFR § 0.459(b)(1).

Cedar Wireless seeks confidential treatment of Exhibits A and B in their entirety.

Cedar Wireless, Inc.

CONFIDENTIAL AND PROPRIETARY INFORMATION
CONFIDENTIAL INFORMATION FILED UNDER SEAL, PURSUANT TO 47 C.F.R. § 0.459

2. CIRCUMSTANCES CAUSING THE SUBMISSION PURSUANT TO 47 CFR § 0.459(b)(2).

Cedar Wireless is submitting confidential agreements between Cedar Wireless and its interconnected VoIP carrier partner (Exhibit A) and an Interconnection Agreement (ICA) between Cedar Wireless' interconnected VoIP carrier partner and an ILEC (Exhibit B) as proof of Cedar Wireless' 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 PURSUANT TO 47 CFR § 0.459(b)(3).

The information for which Cedar Wireless seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors" as defined in 47 CFR § 0.457(d)(2). Confidential Exhibit A consists of commercial agreements between Cedar Wireless and its interconnected VoIP partner while Exhibit B consists of a commercial Interconnection Agreement (ICA) between the interconnected VoIP partner and ILECs in the specified states, all of which contain proprietary information concerning Cedar Wireless' network, customers, and services.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION PURSUANT TO 47 CFR § 0.459(b)(4).

Confidential Exhibit A and Exhibit B contain information relating to commercial matters that could be used by competitors to Cedar Wireless' disadvantage. Cedar Wireless has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by Cedar Wireless could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to Cedar Wireless.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM PURSUANT TO 47 CFR § 0.459(b)(5).

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

Cedar Wireless, Inc.

CONFIDENTIAL AND PROPRIETARY INFORMATION
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6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(6).

Cedar Wireless has not distributed the information in Confidential Exhibits A and B to the public or any parties within Cedar Wireless, Inc. or outside Cedar Wireless except pursuant to appropriate confidentiality agreements.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES PURSUANT TO 47 CFR § 0.459(b)(7).

Cedar Wireless deems the information in Exhibit A and Exhibit B to be confidential.

8. JUSTIFICATION OF THE TIME FRAME DURING WHICH THE SUBMITTING PARTY BELIEVES THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(8).

Cedar Wireless requests that Confidential Exhibits A and B be treated as confidential for a period of five years. This period is necessary due to the proprietary nature of the information in Confidential Exhibits A and B.

9. ADDITIONAL INFORMATION THAT CEDAR WIRELESS, INC. BELIEVES MAY BE HELPFUL IN DETERMINING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED PURSUANT TO 47 CFR § 0.459(b)(9).

The information deals with Cedar Wireless' proprietary network, related to current and planned operations, and as such, is commercially sensitive.

If you should have any questions or concerns, please feel free to contact me at your convenience at 407-794-3510 or ron@csilongwood.com.

Respectfully submitted,



Ron Shelton

Compliance Solutions, Inc.

Telecommunications Consultant To: Cedar Wireless, Inc., LLC.

ron@csilongwood.com

Confidential Public Facing Document

Exhibit A

**AGREEMENT BETWEEN CEDAR WIRELESS, INC.
AND
CARRIER PARTNER**

**Confidential and Proprietary – Filed Separately Under Seal
Pursuant to 47 C.F.R. §0.459**

Confidential Public Facing Document

Exhibit B

**INTERCONNECTION AGREEMENTS BY AND BETWEEN
CARRIER PARTNER
AND
AT&T**

Confidential and Proprietary – Filed Separately Under Seal
Pursuant to 47 C.F.R. §0.459