



VIA ECFS & FIRST-CLASS MAIL
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: Supplement to Application of RGTN USA, Inc. for Authorization to Obtain Numbering Resources (WC Docket No. 23-335); Request for Confidential Treatment of Filing.

Attn:

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, RGTN USA Inc. ("RGTN") hereby submits the following documents in support of its application requesting authorization to obtain numbering resources. This current filing supplements the Application for Authorization to Obtain Numbering Resources ("Application") filed by RGTN on November 15, 2023.

This Application contains the following supplemental information.

1. A signed agreement with Lingo, which shall take the place of the unsigned Agreement contained in Exhibits A and B of the Application.
2. A signed agreement with PortaOne, which shall be supplemented to Exhibits A and B of the Application.

In addition, RGTN clarifies and certifies to the Commission that the company will be fully STIR/SHAKEN compliant before services are initiated in the United States. Indeed, the company is currently working with John Staurulakis, LLC to implement comprehensive STIR/SHAKEN compliance and will submit and update all necessary certifications to the FCC before any U.S. domestic voice traffic is initiated.

Finally, please note that in the original Application, the reference to Exhibit C on Page 5 should be Exhibit D, and the reference to Exhibit D on Page 6 should be Exhibit C.

As contemplated by the Commission's rules, we are filing the public version of the Application electronically and the confidential version via first-class mail.

RGTN 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 grant confidential treatment to Exhibit A and B, a document that contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").¹ RGTN is voluntarily providing this information, "of a kind that would customarily

¹ 5 U.S.C. § 552(b)(4).

not be released to the public”; therefore, this information is “confidential” under FOIA.² Moreover, RGTN would suffer substantial competitive harm if this information were disclosed.³ As such, Exhibits A and B are marked with the header “SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT – NOT FOR PUBLIC INSPECTION.” Further details supporting this request for confidential treatment are contained in Attachment A to this letter.

Any questions you may have regarding this filing should be directed to my attention at (888) 977-7486 or via email to l.herps@rgtn.com. Thank you for your assistance in this matter.

Respectfully Submitted,

/a/

Leonardus Herps

On behalf of RGTN USA Inc.

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

³ See *Nat’l Parks & Conservation Ass’n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

Attachment A

In support of this request and pursuant to Section 0.459(b) of the Commission's rules,⁴ RGTN hereby states as follows:

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT.⁵

RGTN seeks confidential treatment of Exhibit A and B to the enclosed application.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.⁶

As proof of RGTN's facilities readiness as required by Section 52.15(b)(3)(i)(D) of the Commission's rules, RGTN is submitting the agreement between it and its carrier partner as Exhibit A and B.

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

The information for which RGTN seeks confidential treatment contains sensitive commercial information which would customarily be guarded from competitors.⁸ Exhibit A and B describe the agreement between RGTN and its carrier partner and contain proprietary commercial information concerning the operations and pricing of RGTN's carrier partner and RGTN's network, services, and operating costs and expenses.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION.⁹

Exhibit A and B contain information relating to commercial matters that could be used by competitors to RGTN's disadvantage. RGTN 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 RGTN could compromise RGTN's position in this highly competitive industry. Release would therefore result in substantial competitive harm to RGTN.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.¹⁰

Competitors could use RGTN's proprietary commercial and operational information to RGTN's detriment as they would gain access to sensitive information about how RGTN provides services

⁴ 47 C.F.R. § 0.459(b).

⁵ 47 C.F.R. § 0.459(b)(1).

⁶ 47 C.F.R. § 0.459(b)(2).

⁷ 47 C.F.R. § 0.459(b)(3).

⁸ 47 C.F.R. §§ 0.457(d) and 0.459.

⁹ 47 C.F.R. § 0.459(b)(4).

¹⁰ 47 C.F.R. § 0.459(b)(5).

as well as about RGTN'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.¹¹

RGTN has not distributed the information in Exhibit A and B 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.¹²

RGTN has not previously disclosed the information in Exhibit A and B to the public or to third parties.

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

RGTN requests that Exhibit A and B be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information in Exhibit A and B.

9. OTHER INFORMATION THAT RGTN BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.¹⁴

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

¹¹ 47 C.F.R. § 0.459(b)(6).

¹² 47 C.F.R. § 0.459(b)(7).

¹³ 47 C.F.R. § 0.459(b)(8).

¹⁴ 14 47 C.F.R. § 0.459(b)(9).

Exhibit A

RGTN Reciprocal Carrier Services Agreement (Excerpt)

PSTN Demonstrating Interconnection Services for iVoIP Services

**[THIS EXHIBIT
SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT
– NOT FOR PUBLIC INSPECTION –]**

Exhibit B

RGTN Reciprocal Carrier Services Agreement (Full)

**[THIS EXHIBIT
SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT
– NOT FOR PUBLIC INSPECTION –]**