



December 20, 2016
Via ETFS Filing

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

REDACTED FOR PUBLIC
INSPECTION

RE: Request for Confidential Treatment of Filing of Supplemental Information for the VoIPStreet, Inc. dba VoIP Innovations; *Application of VoIPStreet, Inc. dba VoIP Innovations for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 16-*_____

Dear Ms. Dortch:

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

VoIPStreet 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 **Exhibit C** to the application because this document contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").¹ VoIPStreet is voluntarily providing this information, "of a kind that would not customarily be released to the public"; therefore, this information is "confidential" under FOIA². Moreover, VoIPStreet would suffer substantial competitive harm if this information were disclosed.³

The attached is accordingly marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT - NOT FOR PUBLIC INSPECTION."

¹ 5 U.S.C. § 552(b)(4).

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

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

In support of this request and pursuant to Section 0.459(b) of the Commission's rules⁴, VoIPStreet hereby states as follows:

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

VoIPStreet seeks confidential treatment of the attached.

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

VoIPStreet is submitting as Exhibit C the agreement between it and its carrier partner, as proof of VoIPStreet'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.⁷

The information for which VoIPStreet seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors"⁸. Exhibit C describes the agreement between VoIPStreet and its carrier partner and contains proprietary commercial information concerning VoIPStreet's network, customers, and services.

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

Exhibit C contains information relating to commercial matters that could be used by competitors to VoIPStreet's disadvantage. VoIPStreet 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 VoIPStreet could compromise VoIPStreet's position in this highly competitive industry. Release would therefore result in substantial competitive harm to VoIPStreet.

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)(2).

⁹ 47 C.F.R. § 0.459(b)(4).

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM¹⁰

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

VoIPStreet has not distributed the information in Exhibit 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.¹²

VoIPStreet has not previously disclosed the information in Exhibit C.

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

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

¹⁰ 47 C.P.R. § 0.459(b)(5).

¹¹ 47 C.P.R. § 0.459(b)(6).

¹² 47 C.F.R. § 0.459(b)(7).

¹³ 47 C.F.R. § 0.459(b)(8).

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

The information concerns VoIPStreet'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 at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant to VoIPStreet, Inc.

cc: Sebastian Kiely – VoIPStreet
tms: FCx1601b

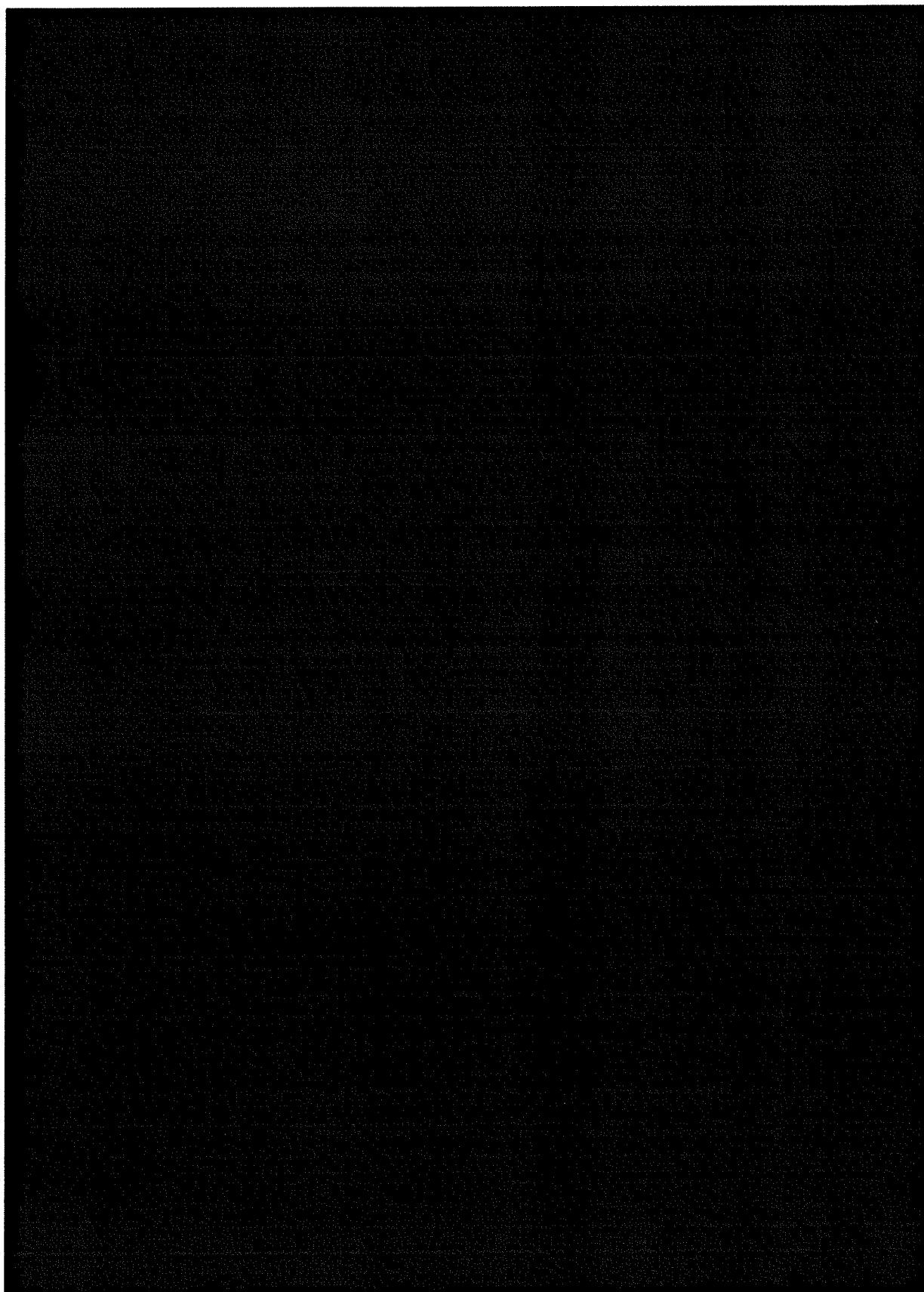
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¹⁴ 47 C.F.R. § 0.459(b)(9).

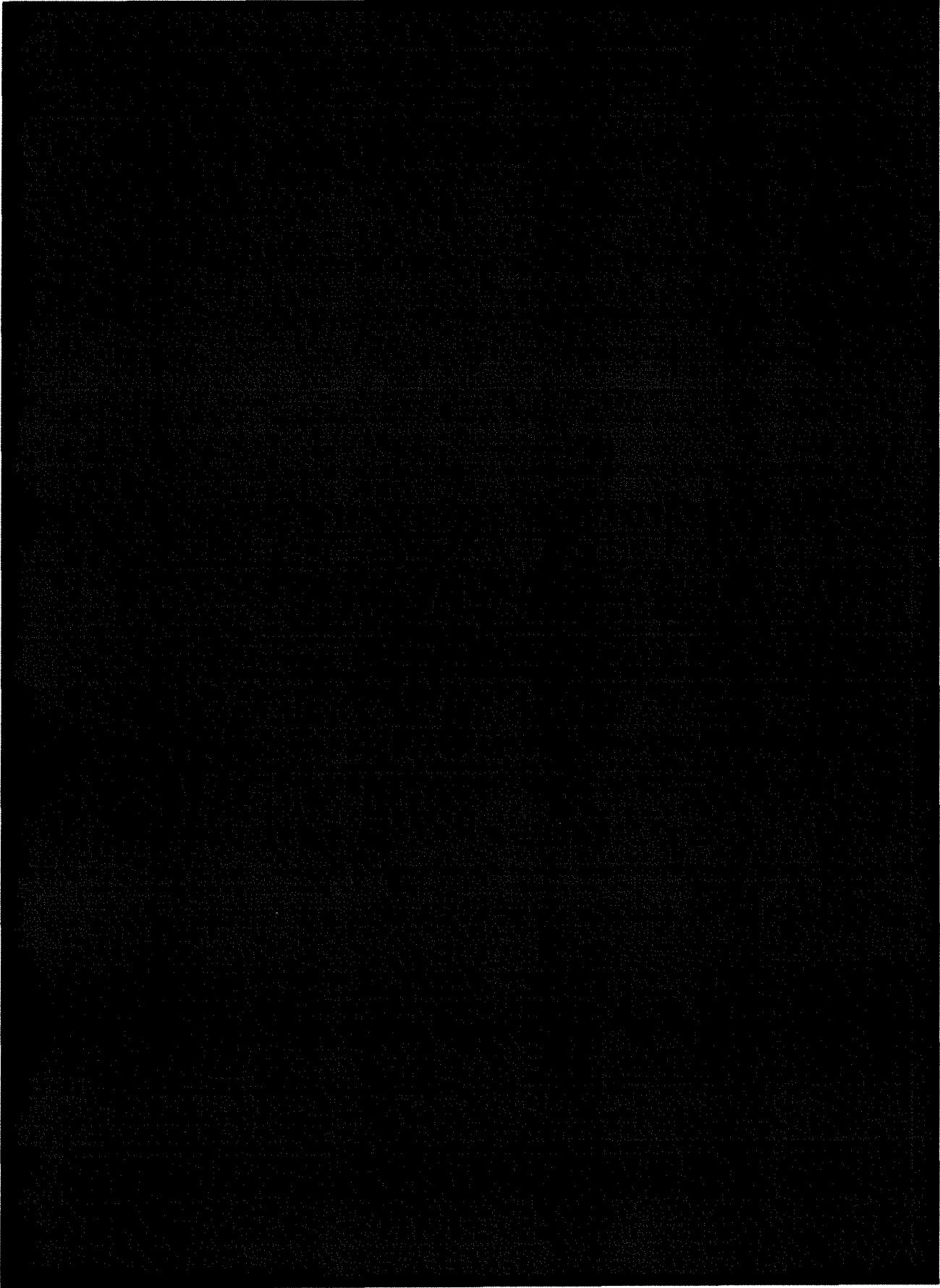
EXHIBIT C

(Confidential attachment submitted separately)

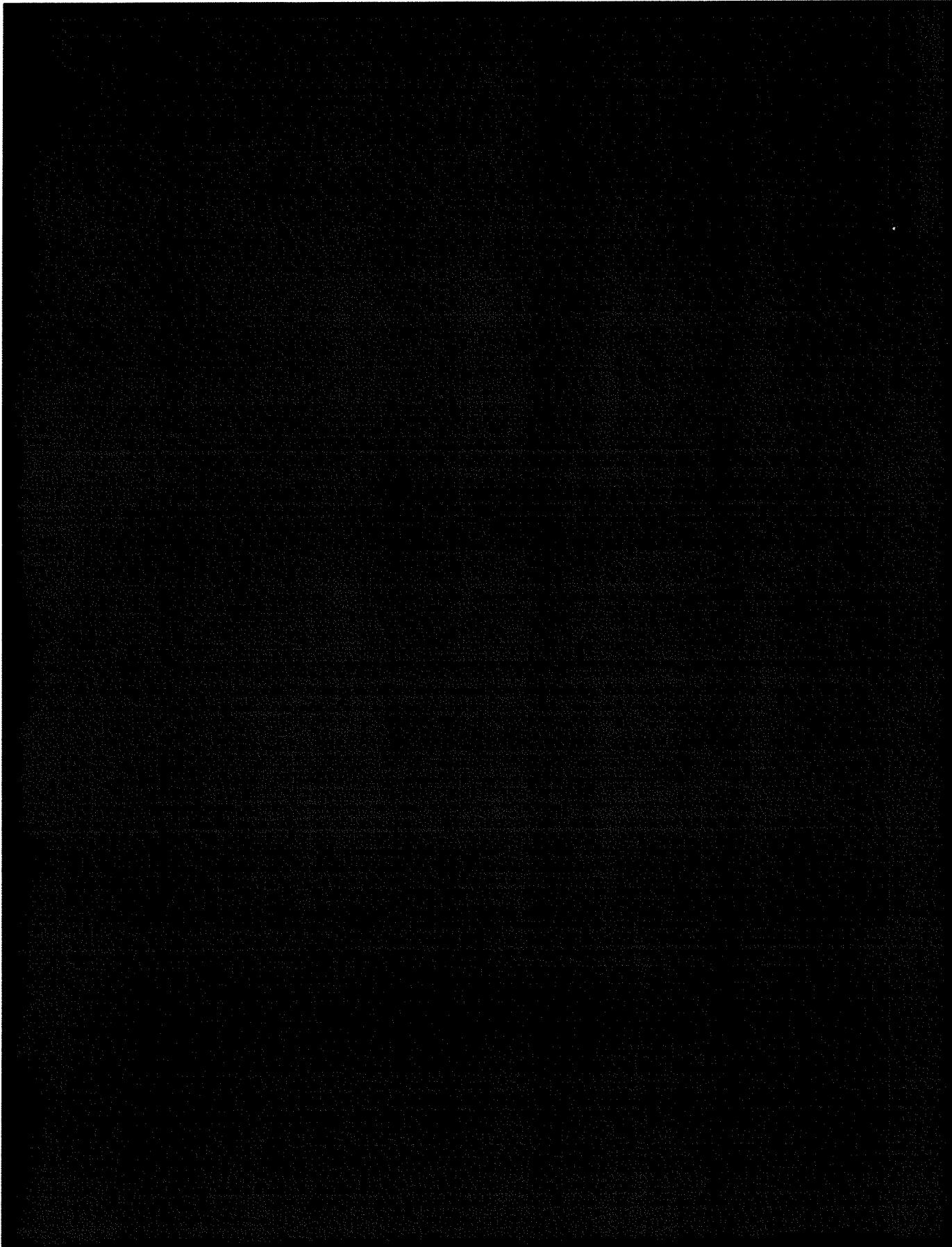
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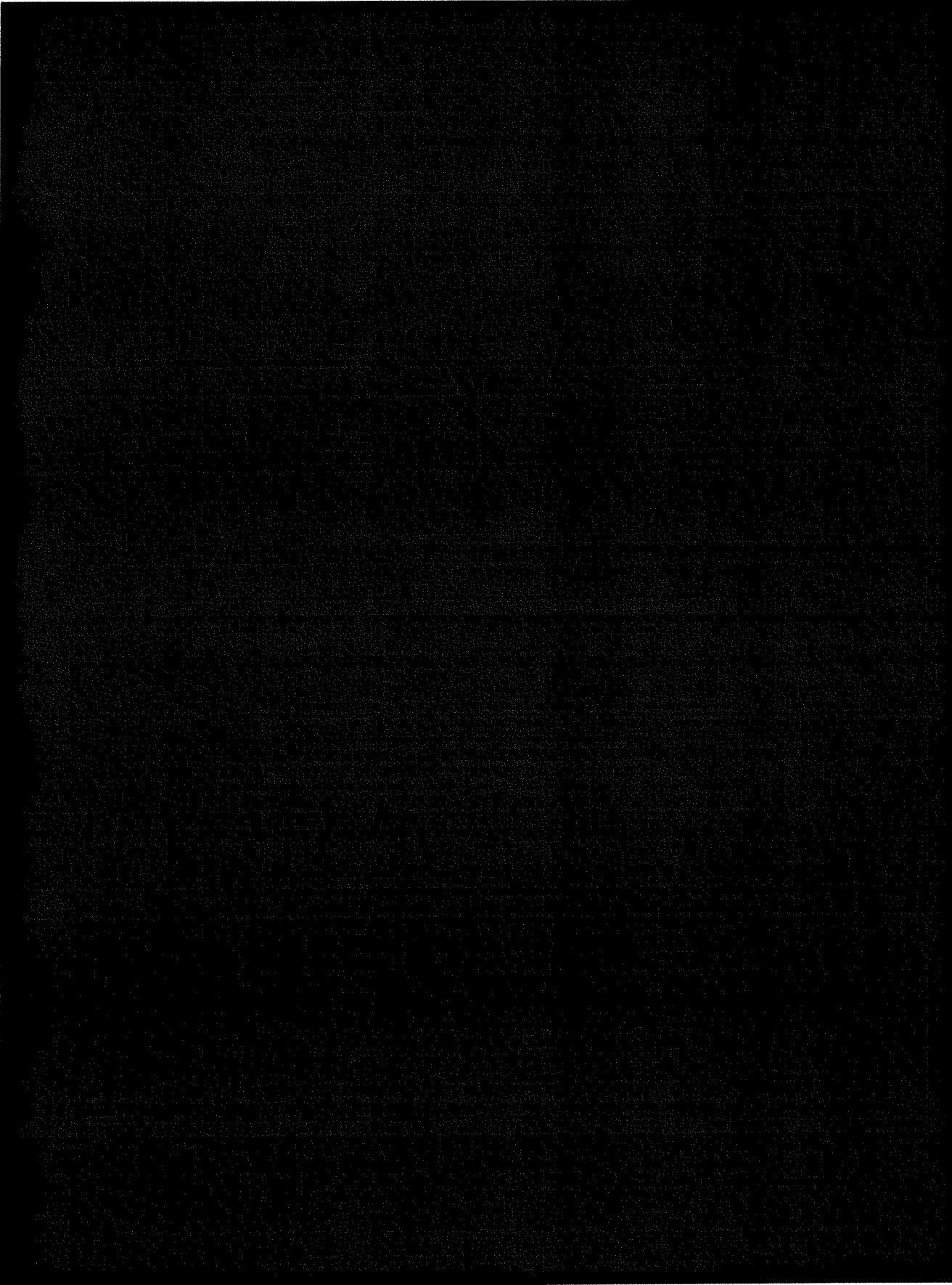
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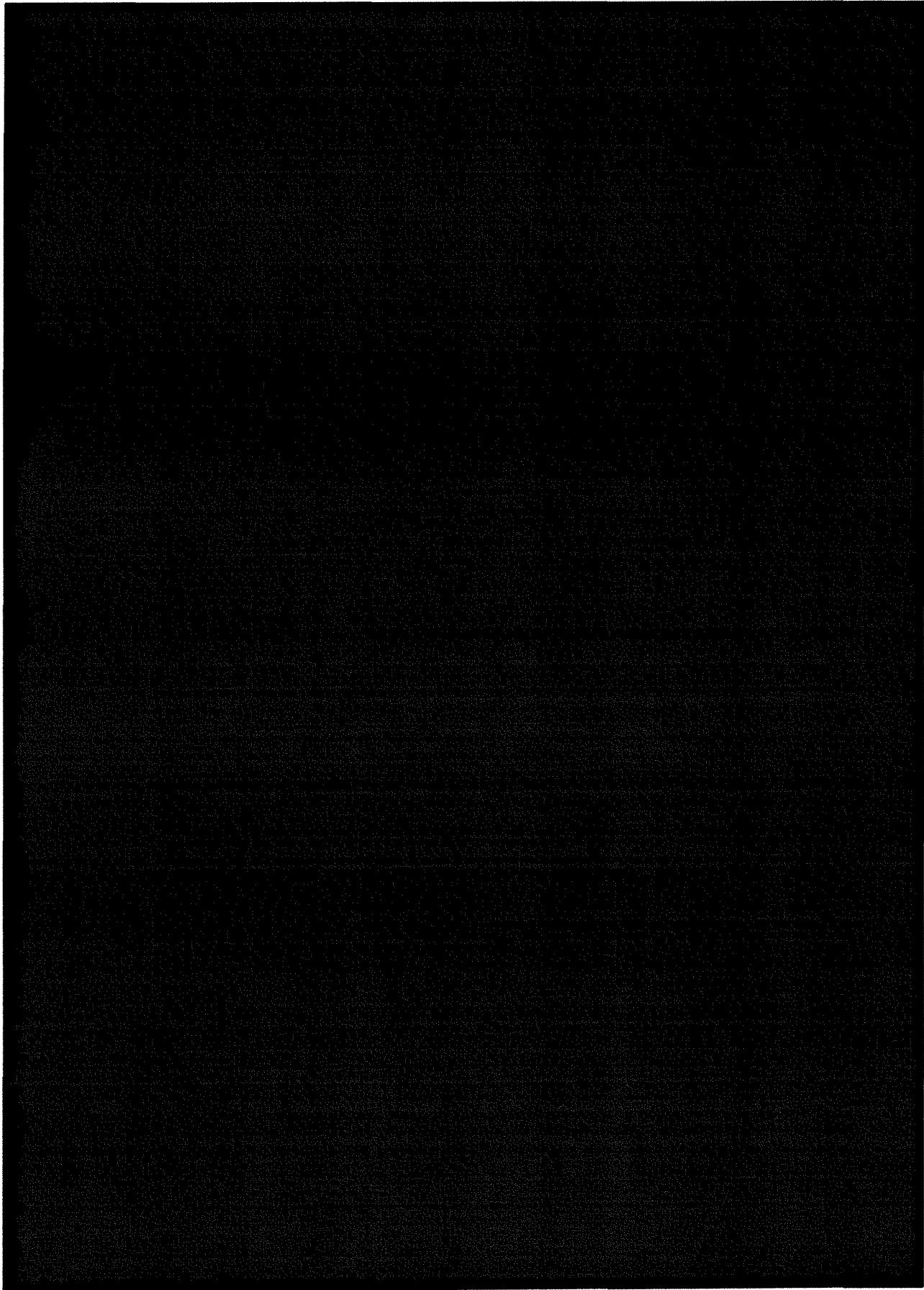
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