

Mark C. Del Bianco
Law Office of Mark C. Del Bianco
3929 Washington Street
Kensington, MD 20895
301.602.5892
mark@markdelbianco.com

May 13, 2016

VIA ECFS

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

**REDACTED FOR PUBLIC
INSPECTION**

Re: Request for Confidential Treatment of Filing by Telnyx LLC: *Telnyx LLC, Applicant, For Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules*, WC Docket No. 15-___

Dear Ms. Dortch:

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

Telnyx 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 Exhibits A and B to the application because the documents contain sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). Exhibit A consists of a commercial agreement between Telnyx and its carrier partner. Pricing information has been redacted from Exhibit A, but it still contains substantial proprietary commercial information concerning Telnyx's network, customers, and services. Exhibit B consists of an interconnection agreement between Telnyx's carrier partner and a local exchange carrier. Telnyx is submitting the agreements as proof of Telnyx's facilities readiness, as required by Section 52.15(g)(3)(i)(D) of the Commission's rules. Exhibits A and B are marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT – NOT FOR PUBLIC INSPECTION."

The information in Exhibit A for which Telnyx seeks confidential treatment concerns Telnyx's proprietary network arrangements, and also contains details of its current and future commercial and operational plans. Telnyx has not previously disclosed the identity of its carrier partner (a signatory on both Exhibits A and B) to the public or any competitors. Telnyx operates in the voice over internet protocol (VOIP) market. It has dozens, if not hundreds, of competitors in the VOIP market. The information in Exhibits A and B is commercially sensitive information that would customarily be guarded from disclosure to those competitors. Disclosure of the detailed operational and commercial information in Exhibit A or the name of the carrier partner

in both Exhibits would give any of Telnyx's competitors an unfair competitive advantage and undercut Telnyx's position in this highly competitive industry. Their release would therefore result in substantial competitive harm to Telnyx.

Telnyx has not previously disclosed the information in Exhibits A or B to the public or any competitors. Telnyx requests that Exhibit A 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. Telnyx requests that Exhibit B be treated as confidential for the same period of time as Exhibit A.

Should you have any questions regarding this confidentiality request or the application, please contact the undersigned at (301) 602-5892.

Respectfully submitted,

A handwritten signature in black ink that reads "Mark C. Del Bianco". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Mark C. Del Bianco

Counsel to Telnyx LLC