

June 25, 2025  
Via ECFSREDACTED FOR PUBLIC INSPECTION

Secretary, Federal Communications Commission  
Washington, DC 20554  
Attn: Wireline Competition Bureau

**RE: Request for Confidential Treatment of Filing of Clear Rate Communications LLC; Supplement to the Application of Clear Rate Communications LLC for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 25-128**

Dear Ms. Dortch,

Pursuant to Section §52.15(g)(3)(i) of the Commission's Rules,<sup>1</sup> Clear Rate Communications LLC ("Clear Rate Communications") hereby submits supplemental information to its Application for Authorization to Obtain Numbering Resources originally submitted on March 6, 2025, in the above-mentioned docket number.

Clear Rate Communications respectfully requests that, pursuant to Sections §0.457 and §0.459 of the Commission's Rules,<sup>2</sup> the Commission withhold from public inspection and accord confidential treatment of **Exhibit A** of the supplement 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").<sup>3</sup> Moreover, Clear Rate Communications would suffer substantial competitive harm if this information were disclosed.

**Exhibit A** of the supplement to the application is accordingly marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT - NOT FOR PUBLIC INSPECTION."

In support of this request, Clear Rate Communications hereby states the following:

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

Clear Rate Communications seeks confidential treatment of **Exhibit A** of the supplement to the application originally submitted on March 6, 2025.

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

Clear Rate Communications is submitting supplemental information per FCC Staff's request to provide additional proof of its 911 and 988 obligations under part 9 of the relevant chapter.

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<sup>1</sup> 47 C.F.R. § 52.15(g).

<sup>2</sup> 47 C.F.R. § 0.457 & §0.459.

<sup>3</sup> 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."

**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 Clear Rate Communications seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors". The supplemental information outlines Clear Rate Communications' compliance with its 911 and 988 obligations, which contain proprietary information concerning Clear Rate Communications' network, customers, and services.

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

**Exhibit A** to the supplement of the application contains information relating to commercial matters which can be used by other interconnected VoIP providers to compromise Clear Rate Communications' position in the highly competitive interconnected VoIP business sector. Detailed operations and commercial information of the type provided by Clear Rate Communications could compromise Clear Rate Communications' position in this highly competitive industry. Accordingly, release of this information would result in substantial competitive harm to Clear Rate Communications.

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

Competitors could use Clear Rate Communications' proprietary commercial and operational information to Clear Rate Communications' detriment as they would gain access to sensitive information concerning Clear Rate Communications' commercial agreements, as well as information as to how Clear Rate Communications provides its services. This information is not normally disclosed to the public.

**6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.**

Clear Rate Communications has not distributed the information in **Exhibit A** of the supplement to the application 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.**

Clear Rate Communications does not believe that the information is available to the public or that the information 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.**

Clear Rate Communications requests that the information in **Exhibit A** of the supplement to the application be withheld from public disclosure indefinitely.

**9. OTHER INFORMATION THAT CLEAR RATE COMMUNICATIONS BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.**

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

For the foregoing reasons, Clear Rate Communications respectfully requests that **Exhibit A** of the supplement to the application be granted confidential status and withheld from public inspection.

Any questions you may have regarding this filing should be directed to my attention at 470-672-3933 or via email to nelson.fernandez@jsitel.com. Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez  
Consultant

tms: FCCv2500b

NF/gs

June 25, 2025  
Via ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: Supplement to the Application of Clear Rate Communications LLC for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 25-128**

Dear Ms. Dortch:

On behalf of Clear Rate Communications LLC ("Clear Rate Communications"), please find enclosed supplemental information relevant to the application for authority to obtain numbering resources ("Application") in the above-mentioned docket. This information is being provided at the request of FCC Commission Staff.

1. Evidence of 911 and CALEA Compliance (§52.15(g)(3)(ii)(E))

In further support of showing its compliance with 911 and CALEA obligations, Clear Rate Communications hereby submits in **Exhibit A** additional proof of its 911 and 988 obligations under part 9 of the relevant chapter. Clear Rate Communications respectfully requests confidential treatment under the Commission's rules for this information.

2. Certification re Foreign Carriers

As required by 47 C.F.R. § 63.18 (h) & (i), Clear Rate Communications certifies that it is not a foreign carrier and is not affiliated with any foreign carrier.

3. Declaration

A declaration under penalty of perjury pursuant to 47 C.F.R. §1.16 is attached hereto as **Exhibit B**.

Any questions you may have regarding this filing should be directed to my attention at 470-672-3933 or via email to [nelson.fernandez@jsitel.com](mailto:nelson.fernandez@jsitel.com). Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez  
Consultant

## **EXHIBIT A**

**(Confidential exhibit submitted separately)**

## **EXHIBIT B**

### **Verification**

## **Verification**

I swear, under penalty of perjury, that I am Doug Black, an officer of the above-named applicant, Clear Rate Communications, LLC, and that I have examined the foregoing application and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

Douglas Black  
Douglas Black  
President