

April 2, 2021

Via ECFS Filing
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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

Re: Second Supplement to Application of Voxtell LLC for Authorization to Obtain Numbering Resources
WC Docket No. 21-58

Dear Ms. Dortch:

Voxtell LLC; here forward known as ("Voxtell"), by its consultant, hereby provides this letter as a second supplement to its Application for Authority to Obtain Numbering Resources, dated February 17, 2021. Pursuant to the request of Commission staff, Voxtell LLC provides an agreement with its carrier partner as proof of network readiness. Voxtell LLC requests confidential treatment of this agreement labeled as Exhibit A, pursuant to Section 52.15(g)(3)(i) of the Commission's Rules.

Voxtell 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 to this application in its 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 is "of a kind that would not customarily be released to the public" and therefore, this information qualifies for confidential treatment under FOIA. Voxtell respectfully submits that it would suffer substantial competitive harm if this information were disclosed.

Exhibit A is 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, Voxtell hereby states as follows:

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

Voxtell seeks confidential treatment of Exhibit A in its entirety.

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

Voxtell is submitting confidential agreements between Voxtell and its interconnected VoIP carrier partner (Exhibit A) as proof of Voxtell'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 PURSUANT TO 47 CFR § 0.459(b)(3).

The information for which Voxtell 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 Voxtell and its interconnected VoIP partner which contain proprietary information concerning Voxtell's 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 contains information relating to commercial matters that could be used by competitors to Voxtell's disadvantage. Voxtell has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by Voxtell could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to Voxtell.

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 Voxtell's proprietary and commercial information to its detriment as they would gain access to sensitive data about how Voxtell provides services as well as about Voxtell'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 PURSUANT TO 47 CFR § 0.459(b)(6).

Voxtell has not distributed the information in Confidential Exhibit A to the public or any parties within Voxtell, LLC or outside Voxtell 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).

Voxtell deems the information in Exhibit A 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).

Voxtell requests that Confidential Exhibit A 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.

9. ADDITIONAL INFORMATION THAT VOXTELL, LLC 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 Voxtell's 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
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Consultant to Voxtell LLC
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407-794-3510

Confidential Public Facing Document

Exhibit A

**AGREEMENT BETWEEN VOXTELL LLC
AND
BANDWIDTH.COM**

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