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January 28, 2021

PUBLIC VERSION –
CONFIDENTIAL INFORMATION EXCLUDED

VIA FEDEX

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

Re: Application of Phone.com, Inc. For Authorization to Obtain Numbering Resources,
Pursuant to Section 52.15(g), Docket No. 21-_____

Dear Ms. Dortch:

Pursuant to §52.15(g)(3)(i) of the Commission's Rules,¹ Phone.com, Inc. ("Phone.com") files its Application for Authorization to Obtain Numbering Resources. Please note, this Application contains confidential material, the disclosure of which would competitively harm the Company. Accordingly, Phone.com requests this material be filed under seal, pursuant to §0.459 of the Commission's Rules.² In support of this request, Phone.com submits the following:

1. Identification of the information for which confidential treatment is sought.

Phone.com seeks confidential treatment of **Exhibits A and B** to its Application, and specific references to these exhibits found in the body of its Application.

¹ 47 C.F.R. § 52.15(g).

² 47 C.F.R. § 0.459.

2. *Description of the circumstances giving rise to the submission.*

As part of its Application, Phone.com is including the agreements between its carrier partners as proof of its facilities readiness as required by §52.15(g)(3)(i)(D) of the Commission's Rules, and copies of a number of the carriers' interconnection agreements with incumbent carriers.

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 Phone.com seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors. The Exhibits to this Application describes the agreements between Phone.com and its carrier partners and contains proprietary commercial information concerning Phone.com's network, customers, financing, and services.

4. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*

The Exhibits contain information relating to commercial matters which can be used by other interconnected Voice over Internet Protocol ("VoIP") providers to compromise Phone.com's position in the highly competitive interconnected VoIP sector. Accordingly, release of this information would result in substantial competitive harm to Phone.com.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Competitors could use Phone.com's proprietary commercial and operational information to Phone.com's detriment as they would gain access to sensitive information concerning Phone.com's commercial agreements, as well as information as to how Phone.com provides its services. This information is not typically disclosed publicly.

6. *Identification of any measures taken to prevent unauthorized disclosure, or if the information has been disclosed previously.*

Neither Phone.com nor its carrier-partners have distributed the information to the public or to any third party.

7. *Justification of the period during which Phone.com asserts that material should not be available for public disclosure.*


Phone.com requests that the Exhibits be treated as confidential for a minimum period of ten years. This period is necessary due to the nature of the proprietary information in the Exhibits of the Application.

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Two copies of the non-public version of this Application, which include the confidential information has been submitted via FedEx.

Thank you for your assistance in this matter and please do not hesitate to contact me at (202) 792-6422, or kmarshall@potomaclaw.com if you have any questions or concerns.

Respectfully submitted,

A handwritten signature in blue ink that reads "Katherine E. Barker Marshall". The signature is written in a cursive, flowing style.

Katherine Barker Marshall, Counsel to Phone.com, Inc.

cc: Ari Rabban, Phone.com, Inc.