



Potomac Law Group, PLLC  
1300 Pennsylvania Avenue, NW, Suite 700  
Washington, D.C. 20004  
Telephone: (202) 792-6422  
Fax: (202) 318-7707

October 30, 2020

PUBLIC VERSION –  
CONFIDENTIAL INFORMATION EXCLUDED

VIA ECFS

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

Re: Application of IntelPeer Networks LLC, For Authorization to Obtain Numbering Resources, Pursuant to Section 52.15(g), Docket No. 20-\_\_\_\_\_

Dear Ms. Dortch:

Pursuant to §52.15(g)(3)(i) of the Commission's Rules,<sup>1</sup> IntelPeer Networks LLC ("IntelPeer") 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, IntelPeer requests this material be filed under seal, pursuant to §0.459 of the Commission's Rules.<sup>2</sup> In support of this request, IntelPeer submits the following:

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

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

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

---

<sup>1</sup> 47 C.F.R. § 52.15(g).

<sup>2</sup> 47 C.F.R. § 0.459.

As part of its Application, IntelPeer is including the agreement between its carrier partner 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 carrier's 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 IntelPeer seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors." The Exhibits to this Application describes the agreement between IntelPeer and its carrier partner and contains proprietary commercial information concerning IntelPeer'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 IntelPeer's position in the highly competitive interconnected VoIP sector. Accordingly, release of this information would result in substantial competitive harm to IntelPeer.

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

Competitors could use IntelPeer's proprietary commercial and operational information to IntelPeer's detriment as they would gain access to sensitive information concerning IntelPeer's commercial agreements, as well as information as to how IntelPeer 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 IntelPeer nor its carrier-partner have distributed the information to the public or to any third party.

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

IntelPeer 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.

Marlene Dortch, Secretary  
Federal Communications Commission  
October 30, 2020

Page 3 of 3

Concurrent with this filing in ECFS, two copies of the non-public version of this Application have been submitted to the Secretary's Office via courier.

Thank you for your assistance in this matter and please do not hesitate to contact me at (202) 792-6422, or [kmarshall@potomacclaw.com](mailto:kmarshall@potomacclaw.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 IntelPeer Network LLC

cc: Kristin Manwarren, IntelPeer Network LLC