

Compliance Solutions, Inc.

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March 31, 2021

Via ECFS Filing

REDACTED FOR PUBLIC INSPECTION

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

RE: Request for Confidential Treatment to Application of Advanced Communications, L.L.C. for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(G) of the Commission's Rules

Dear Ms. Dortch,

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, Advanced Communications, L.L.C.; here forward known as ("Advanced Communications") hereby submits its application requesting authorization to obtain numbering resources as an IPES carrier.

Advanced Communications 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. Advanced Communications 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, Advanced Communications hereby states as follows:

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

Advanced Communications seeks confidential treatment of Exhibit A in its entirety.

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

Advanced Communications is submitting confidential agreements between Advanced Communications and its interconnected VoIP carrier partner (Exhibit A) and a publicly available Interconnection Agreement (ICA) between Advanced Communications' interconnected VoIP carrier partner and an ILEC as proof of Advanced Communications' 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 Advanced Communications 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 Advanced Communications and its interconnected VoIP partner which contain proprietary information concerning Advanced Communications' 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 Advanced Communications' disadvantage. Advanced Communications has numerous competitors in the telecommunications industry in which it operates. Detailed commercial information on operations of the type provided by Advanced Communications could compromise its position in this highly competitive industry. Release of this information would therefore result in substantial competitive harm to Advanced Communications.

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 Advanced Communications' proprietary and commercial information to its detriment as they would gain access to sensitive data about how Advanced Communications provides services as well as about Advanced Communications' commercial agreements with others in the market that are not normally disclosed to the public.

Advanced Communications, L.L.C.

CONFIDENTIAL AND PROPRIETARY INFORMATION

CONFIDENTIAL INFORMATION FILED UNDER SEAL, PURSUANT TO 47 C.F.R. § 0.459

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE PURSUANT TO 47 CFR § 0.459(b)(6).

Advanced Communications has not distributed the information in Confidential Exhibits A to the public or any parties within Advanced Communications, L.L.C. or outside Advanced Communications 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).

Advanced Communications 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).

Advanced Communications 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 ADVANCED COMMUNICATIONS, L.L.C. 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 Advanced Communications' 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

Compliance Solutions, Inc.

Telecommunications Consultant To: Advanced Communications, L.L.C.

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Confidential Public Facing Document

Exhibit A

**AGREEMENT BETWEEN ADVANCED COMMUNICATIONS,
L.L.C.**

AND

CARRIER PARTNER

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