

ANDREW O. ISAR



Via ECFS

April 23, 2019

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

RE: Prepaid Calling Card Provider Quarterly Reporting and Certification Pursuant to
47 C.F.R. § 64.5001(c), WC Docket No. 05-68

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.5001(c) of the Commission's rules, enclosed for filing with the Commission is an original and one (1) confidential copy of TCS Communication Solutions, LLC ("TCS") prepaid calling card provider report and corresponding certification ("Report") for the quarter ending March 31, 2019.

Pursuant to 47 C.F.R. § 0.459 of the Commission's rules, TCS respectfully requests that the Report be protected as confidential and withheld from public inspection. In support of its request, TCS states as follows. The Report is produced solely for the purpose of complying with Section 64.5001(c) of the Commission's rules. The Report contains sensitive proprietary information regarding TCS's operations as is required under Section 64.5001(c). TCS is a privately-owned entity that operates in a highly competitive prepaid calling card market. Report information, if released, would hold significant commercial value for TCS's competitors, as it would divulge the type of operations in which TCS engages, the Company's approximate operating revenues and other financial data that could be derived from the report, thus ultimately undermining the Company's ability to compete. The Report is prepared exclusively to comply with the provisions of Section 64.5001(c), and is not otherwise available to TCS employees, customers, third parties, or to the general public. TCS maintains that the withholding of its Report from public inspection would have no detrimental impact on the public at large, nor provide any useful information to the public, save to TCS's competitors. TCS respectfully requests that if ultimately available to the public, such information should not become available for release in not less than five years.

Ms. Marlene H. Dortch
April 23, 2019
Page 2

Based on the foregoing, TCS's Request for Confidential Treatment presents a case for non-disclosure of confidential information consistent with the provisions of Section 0.459 and 5 U.S.C. § 552. TCS's request should be granted, and the confidential Report attached hereto under separate seal, should be withheld from public inspection.

Thank you for your attention to this matter. Questions regarding this matter should be addressed to the undersigned.

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar

Andrew O. Isar

Regulatory Consultants to
TCS Communication Solutions, LLC

Enclosure

**CONFIDENTIAL TREATMENT REQUESTED
NOT FOR PUBLIC INSPECTION**

STATE OF MARYLAND

)

) ss.

COUNTY OF TALBOT

)

**CONFIDENTIAL CERTIFICATION OF
TCS COMMUNICATION SOLUTIONS, LLC
PURSUANT TO 47 C.F.R. § 64.5001(c)**

I, Bruce Hollis, do hereby swear under oath that I am Managing Director and an officer of TCS Communication Solutions, LLC ("TCS"), and authorized to make the following certification pursuant to 47 C.F.R. § 64.5001(c).

1. My current office address is 13085 Lewistown Road, Queen Anne, MD 21657.
2. In accordance with 47 C.F.R. § 64.5001(c), TCS reports the following information with respect to prepaid calling card services provided by TCS during the calendar quarter ended March 31, 2019.
 - a. 47 C.F.R. § 64.5001(c)(1) Percentage of prepaid calling minutes by jurisdiction (rounded to nearest hundredth of a percent):

i. Intrastate	20.02%
ii. Interstate	23.95%
iii. International	56.03%
 - b. 47 C.F.R. § 64.5001(c)(2) Percentage of total prepaid calling card revenue attributable to interstate and international calls:

i. Interstate	13.36%
ii. International	75.87%
 - c. Pursuant to 47 C.F.R. § 64.5001(c)(3), TCS will make the required contribution to the federal Universal Service Fund based on the information reported in (b), above, if required to do so pursuant to FCC rules; At the present time TCS qualifies for the limited revenue exemption exception to direct contribution, pursuant to 47 C.F.R. § 54.706(c).
 - d. Pursuant to 47 C.F.R. § 64.5001(c)(4), I aver that information required in 47 C.F.R. § 64.5001(a) with respect to TCS was made available to the carrier from which it purchased transport services.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of April 2019.

TCS Communication Solutions, LLC



Bruce Hollis
Managing Director
13085 Lewistown Road
Queen Anne, MD 21657