

8300 Greensboro Dr.
Suite 1200
Tysons, VA 22102

(703) 584-8676
WWW.FCCLAW.COM
NOT ADMITTED IN VA

LLGS | LUKAS
LAFURIA
GUTIERREZ
& SACHS LLP

May 31, 2019

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

Re: Annual Employment Report 2019
FCC Form 395
WC Docket No. 16-233

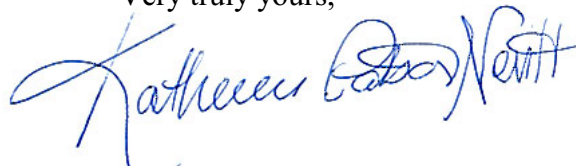
To Whom It May Concern:

On behalf of Comtronics Corp. submitted herewith is the company's Common Carrier Annual Employment Report for 2019, along with a request for confidential treatment of FCC Form 395 data, consistent with Section 0.459 of the Commission's rules, 47 CFR § 0.459.

A redacted version of this Report has been submitted electronically via the FCC's Electronic Comment Filing System (ECFS) in Proceeding 16-233 (WC Docket 16-233).

Should any questions arise with respect to this matter, please communicate directly with this office.

Very truly yours,



Katherine Patsas Nevitt

Enclosures

COMTRONICS CORP
COMMON CARRIER ANNUAL EMPLOYMENT REPORT
FCC FORM 395
REQUEST FOR CONFIDENTIALITY

47 C.F.R. 0.459

Comtronics Corp. ("Filer") requests confidential treatment of its common carrier annual employment report, FCC Form 395 ("Annual Employment Report"), pursuant to Section 0.459 of the Rules of the Federal Communications Commission ("FCC Rules"), 47 C.F.R. § 0.459. In support of this request, Filer submits the following:

(1) Filer requests that its Annual Employment Report and associated records be given confidential treatment and withheld from public inspection.

(2) Filer's Annual Employment Report is submitted in compliance with FCC Rule Section 1.815, 47 C.F.R. § 1.815. As a telecommunications service provider, Filer is required to collect and report employment data, classifications and complaints. The information supplied by Filer is by its nature proprietary, entitled to safeguards and security measures.

(3) The Annual Employment Report contains privileged information derived from Filer's internal records regarding personnel and events. Summaries of the number and type of employed persons, and their complaints (if any), are extremely sensitive. Filer's reports therefore should be accorded confidential treatment in accordance with Section 0.459 of FCC Rules.

(4) Information contained in Filer's reports concerns the provision of telecommunications services provided Filer in a highly competitive marketplace. Disclosure of competitively and commercially sensitive employment data can have a direct, adverse effect on Filer. Privileged employment information can be negatively publicized, misinterpreted, or otherwise used to disadvantage former, prospective and existing employees, Filer's customers or agents, or Filer itself.

(5) Disclosure of employment data could cause substantial competitive harm by damaging Filer's relations with vendors, competitors and customers. If Filer's employment report were to be released, efforts to address personnel and Equal Employment Opportunity (EEO) issues could be thwarted or discouraged. Filer's regulatory compliance could be unjustly questioned or jeopardized. If Filer's employment data is made public, ill-intentioned individuals could devise creative methods to inhibit, lure, deceive, threaten, or compromise Filer's employees. To prevent harm, Filer's Annual Employment Report must be withheld from public disclosure.

Request for Confidentiality

Page two

(6) Filer consistently seeks to prevent unauthorized disclosure of employment data. Prevention of improper or unauthorized access protects employee identities and personal information. Filer limits distribution of pertinent materials within its organization to persons who have a need for access to employment data and privileged personnel information, and who are aware of the security breaches that could be caused by unauthorized access to or misuse of employees' data and privacy. This confidentiality should extend to information submitted to the Commission in compliance with annual employment reporting rules. Filer does not share with unauthorized third parties confidential information or materials regarding employment data, complaints, human resource facilities or employee training. This information must remain confidential.

(7) Information submitted in Filer's Annual Employment Report to the Commission is not available to the public or to third parties who are not under an obligation to treat the materials as confidential.

(8) Materials related to Annual Employment Reports are not routinely available for public inspection and should be withheld from public disclosure now and in the future.

(9) Public disclosure of any portion of sensitive information contained in the Annual Employment Report or related materials could expose Filer's employment protocols to untrustworthy persons, potentially compromising the security of the Filer's employees and network system. Such exposure would jeopardize public safety, the integrity of Filer's facilities and the security of Filer's human resources system.

For the foregoing reasons, Filer respectfully requests that its Annual Employment Report and related materials be awarded confidential treatment and be withheld from public inspection.

COMMON CARRIER ANNUAL EMPLOYMENT REPORT

[Please read instructions before completing and for Notice regarding public burden.]

SECTION I - General Information

1. Name and Mailing Address of Respondent

Comtronics Corp
1230 Furnace Brook Parkway, Quincy, MA 02169☐ Check here if this
is a change of
address.

2. Year Report Filed

2019

3. Reporting Period (Ending Date of Pay
Period Covered by Report)

2/24/2019

4. Number of Full-Time Employees during Selected

Reporting Period (check one):

- a.
- ☐
- Fewer than 16 (complete Sections I, IV, and V only)
-
- b.
- ☒
- 16 or more (complete all sections)

SECTION II - Full-Time Employees.

Job Categories	Number of Employees (Report employees in only one category)														Total Columns A - N	
	Hispanic or Latino		Race/Ethnicity													
			Male						Female							
	Male	Female	White	Black or	Native	Asian	American	Two or more	White	Black or	Native	Asian	American	Two or more		
Executive/Senior Level Officials and Managers	1.1															
First/Mid-Level Officials and Managers	1.2															
Professionals	2															
Technicians	3															
Sales Workers	4															
Administrative Support Workers	5															
Craft Workers	6															
Operatives	7															
Laborers and Helpers	8															
Service Workers	9															
TOTAL	10															
PREVIOUS YEAR TOTAL	11															

SECTION III - Part-Time Employees.

Job Categories		Number of Employees (Report employees in only one category)														Total Columns A - N
		Race/Ethnicity														
		Hispanic or Latino		Not-Hispanic or Latino												
				Male						Female						
		Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	
Executive/Senior Level Officials and Managers	1.1															
First/Mid-Level Officials and Managers	1.2															
Professionals	2															
Technicians	3															
Sales Workers	4															
Administrative Support Workers	5															
Craft Workers	6															
Operatives	7															
Laborers and Helpers	8															
Service Workers	9															
TOTAL	10															
PREVIOUS YEAR TOTAL	11															

SECTION IV - Report of Discrimination



This is to advise the Cor company before any body having competent jurisdiction in such matters during the calendar year covered by this report.



This is to advise the Commission that the following complaints alleging violations of the provisions of any equal employment opportunity statute have been filed against this company. (Attach a list indicating parties involved, date filed, courts or agencies before which the matter has been heard, file number or other designation, and current status or disposition.

SECTION V - Certification

I certify that to the best of my knowledge, information, and belief, all statements in this report are true and correct.

Date 05/16/2019	Typed or Printed Name of Person Signing Patricia A. Scheim	Signature 	Telephone No. (617) 770-0212
Title of Person Signing Human Resource Director		WILLFULLY FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (18 U.S.C. 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (47 U.S.C. 312 (A)(1) AND/OR FORFEITURE (47 U.S.C. 503).	