

July 26, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, N.W.  
Washington D.C. 20554

**Re: Comments of Data@ccess Communications, Inc.  
Uniendo a Puerto Rico Fund  
WC Docket Nos. 18-143, 10-90 and 14-58**

Dear Ms. Dortch:

Data@ccess Communications, Inc. ("Data@ccess" or "the Company") respectfully requests confidential treatment of certain information and documents in this filing, because this information is competitively sensitive and its disclosure would have a negative competitive impact on the Company were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 C.F.R. §§ 0.457 and 0.459.

The reason for this request is that specific information in this filing is confidential and proprietary to the Company as "trade secrets and commercial or financial information" under Section 47 C.F.R. § 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with the Company's ongoing business and operations.

In accordance with 47 C.F.R. § 0.459, the Company provides the following details to the Commission to support its request for confidential treatment of certain information and documents in this filing:

- Information for which confidential treatment is sought: The Company requests that specific information in the filing regarding the Company's proposal for the use of Stage 2 funding be treated as confidential. The Company will identify confidential information in its Comments by marking it "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**" The Company will redact its public version to remove confidential information.
- Commission proceeding in which the information was submitted: The information is being submitted as part of **WC Docket Nos. 18-143, 10-90 and 14-58.**
- Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged: The details of proposed projects and their construction locations is commercial information and contains trade secrets. The information is competitively sensitive information and is not normally released to the public. As such, its release would have a substantial negative competitive impact on Company.
- Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm: The market for the services the Company provides is competitive; thus, the release of this

confidential and proprietary information would cause the Company competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of Company's business at a level of detail not currently available to the public.

- Measures taken by the Company to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosures of the information to third parties: The Company has treated and continues to treat the non-public information identified as confidential in its Comments as confidential and has protected it from public disclosure to parties outside of the Company.
- Justification of the period during which Company asserts that the material should not be available for public disclosure: The Company cannot determine at this time any date on which this information should not be considered confidential. The details on the Company's proposed projects may be released to the public if/at such time that Data@ccess is awarded Stage 2 funding, and uses such funding as proposed.
- Other information Company believes may be useful in assessing whether its request for confidentiality should be granted: Under applicable Commission decisions, the information in question should be withheld from public disclosure.

/s/ Walter Arroyo

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Enclosures