

**iCommLaw**

1547 Palos Verdes, #298  
Walnut Creek, CA 94597  
Phone: (415) 699-7885  
Facsimile: (925) 274-0988  
anita@icommlaw.com

---

August 7, 2017

Via Electronic Comment Filing System

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

**REDACTED FOR PUBLIC  
INSPECTION**

*Re: Request for Confidential Treatment for Application of One Ring Networks, Inc. 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, One Ring Networks, Inc. ("One Ring") hereby submits its application requesting authorization to obtain numbering resources.

One Ring 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 and treatment Exhibit 1 to this application as confidential because that document contains sensitive trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").<sup>1</sup> The information in Exhibit 1 is "of a kind that would not customarily be released to the public," therefore, this information qualified for confidential treatment under FOIA<sup>2</sup> One Ring respectfully submits that it would suffer substantial competitive harm if this information were disclosed.<sup>3</sup>

Exhibit 1 is accordingly marked with the header "SUBJECT TO REQUEST  
FOR CONFIDENTIAL TREATMENT – NOT FOR PUBLIC INSPECTION."

---

<sup>1</sup> 5 U.S.C. § 552(b)(4).

<sup>2</sup> *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

<sup>3</sup> *See National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

In support of this request and pursuant to Section 0.459(b) of the Commission's rules,<sup>4</sup> One Ring hereby states as follows:

**1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT<sup>5</sup>**

One Ring seeks confidential treatment of Exhibit 1 to the enclosed application.

**2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION<sup>6</sup>**

One Ring is submitting the Confidential agreement between it and its carrier partner, as proof of One Ring's 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<sup>7</sup>**

The information for which One Ring seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors."<sup>8</sup> Exhibit 1 consists of a commercial agreement between One Ring and its carrier partner and contains proprietary commercial information concerning One Ring's network, customers, and services.

**4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION<sup>9</sup>**

Exhibit 1 contains information relating to commercial matters that could be used by competitors to One Ring's disadvantage. One Ring has numerous competitors in the Voice over Internet Protocol ("VoIP") services sector in which it operates. Detailed operations and commercial information of the type provided by One Ring could compromise One Ring's position in this highly competitive industry. Release would therefore result in substantial competitive harm to One Ring.

---

<sup>4</sup> 47 C.F.R. § 0.459(b).

<sup>5</sup> 47 C.F.R. § 0.459(b)(1).

<sup>6</sup> 47 C.F.R. § 0.459(b)(2).

<sup>7</sup> 47 C.F.R. § 0.459(b)(3).

<sup>8</sup> 47 C.F.R. § 0.457(d)(2).

<sup>9</sup> 47 C.F.R. § 0.459(b)(4).

**5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM<sup>10</sup>**

Competitors could use One Ring's proprietary commercial and operational information to One Ring's detriment as they would gain access to sensitive information about how One Ring provides services as well as about One Ring's commercial agreements with others in the market that are not normally disclosed to the public.

**6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE<sup>11</sup>**

One Ring has not distributed the information in Exhibit 1 to the public.

**7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES<sup>12</sup>**

One Ring has not previously disclosed the information in Exhibit 1.

**8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE<sup>13</sup>**

One Ring requests that Exhibit 1 be treated as confidential for a period of ten years. This period is necessary due to the proprietary nature of the information in Exhibit 1.

**9. OTHER INFORMATION THAT ONE RING BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED<sup>14</sup>**

The information concerns One Ring's proprietary network information, related to current and planned commercial and operational information, and as such, is commercially sensitive.

Should you have any questions regarding the foregoing information, please don't hesitate to contact me.

Respectfully submitted,

/s/Anita Taff-Rice

---

<sup>10</sup> 47 C.F.R. § 0.459(b)(5).

<sup>11</sup> 47 C.F.R. § 0.459(b)(6).

<sup>12</sup> 47 C.F.R. § 0.459(b)(7).

<sup>13</sup> 47 C.F.R. § 0.459(b)(8).

<sup>14</sup> 47 C.F.R. § 0.459(b)(9).

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<i>In the Matter of</i>	)	
	)	
One Ring Networks, Inc. Application	)	
for Authorization to Obtain Number	)	WC Docket No. 17-_____
Resources Pursuant to Section 52.15(g)	)	
of the Commission's Rules	)	

**APPLICATION OF ONE RING HOLDINGS CORP.  
FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES**

One Ring Networks, Inc. ("One Ring"), pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, requests authorization to obtain numbering resources. The Commission authorized interconnected VoIP providers such as One Ring to obtain numbering resources from the Numbering Administrator in its *Numbering Order*.<sup>1</sup> This Application complies with the requirements set forth in Sections 52.15(g)(3)(i)(A)-(F) of the Commission's Rules. In support of this application, One Ring provides the following information:

**I. INFORMATION REQUIRED BY SECTION 52.15(g)(3)(i)**

**(A) § 52.15(g)(3)(i)(A)**

<b>Name:</b>	One Ring Networks, Inc.
<b>Address:</b>	411 E Clinton Avenue, Athens, TX 75751
<b>Telephone:</b>	(214) 382-9900

**Qualified Regulatory and Compliance Contact:** John Jenkins

---

<sup>1</sup> *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015).

**(B) § 52.15(g)(3)(i)(B)**

One Ring hereby acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's Rules is subject to compliance with applicable Commission numbering rules as well as to the numbering authority delegated to the states. One Ring hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices regarding numbering, just as to telecommunications carriers.

**(C) § 52.15(g)(3)(i)(C)**

One Ring hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators.

**(D) § 52.15(g)(3)(i)(D)**

One Ring submits that it is capable of providing service within 60 days of the numbering resources activation date. One Ring obtains interconnection with the PSTN pursuant to an agreement with a CLEC partner for routing its VoIP traffic to ILECs. One Ring has attached the agreement to this application as **Confidential Exhibit 1**. Pursuant to this agreement, the CLEC partner will provide PSTN connectivity for inbound calls to One Ring numbers via the CLEC's tandem switches.

One Ring currently has 4,000 telephone numbers in service in Texas and Georgia. It currently obtains telephone numbers from CLEC partners such as Broadvox/Onvoy and Digital Agent. One Ring has obtained an OCN (065J), that will be associated with a NECA company code in the category of Internet Protocol Enabled Services. One Ring will ensure that its OCN is listed in the LERG and NPAC by the time it receives authority to obtain telephone numbers directly. While One Ring relies on CLEC partners to perform number portability, One Ring is familiar with the FCC's requirements for porting telephone numbers and acknowledges its obligation to comply with those requirements.

**(E) § 52.15(g)(3)(i)(E)**

One Ring hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17, 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9. A written certification confirming compliance with all of these obligations is provided as **Exhibit 2**.

**(F) § 52.15(g)(3)(i)(F)**

One Ring hereby certifies that it has the managerial, technical and financial ability to provide reliable service. One Ring is a hybrid fixed wireless and fiber provider that provides high speed internet and phone service via VoIP primarily to commercial customers. One Ring has provided these services in Texas and Georgia since 2005.

One Ring's key management and technical personnel are listed below. None of the identified personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

**Key Personnel:**

**Chief Executive Officer:** John Jenkins has been an executive in the Telecommunications industry for over 25 years. He has been in charge of regulatory issues, financial and technical issues with each of the companies he has worked for or owned. John has a degree in physics for UCLA.

**Senior Voice Engineer:** Jason Fisher has been an executive in the Telecommunication industry for over 20 years. He has been in charge of the engineering of all telecom issues for each of the companies he has worked for. Jason was trained in the industry initially through his service in the military.

**Vice President of Operations:** Sotheara Leang has been an executive in the Telecommunication industry for over 15 years. He has been in charge of financials, technical and numbering along with all regulatory issues for the companies he has work for. He has a degree in Electrical Engineering from the University of Texas at Dallas.

**(G) § 52.15(g)(3)(i)(G)**

One Ring hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

**II. ACKNOWLEDGEMENT OF CONDITIONS IN SECTION 52.15(g)(3)(iv)**

As required by Section 52.15(g)(3)(iv), One Ring will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within 30 days of any changes. One Ring will also furnish accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

**III. CONCLUSION**

Pursuant to Section 52.15(g)(3)(i) of the Commissions' Rules, One Ring respectfully requests that the Commission grant this application for authorization to obtain numbering resources in Georgia and Texas.

Respectfully submitted,

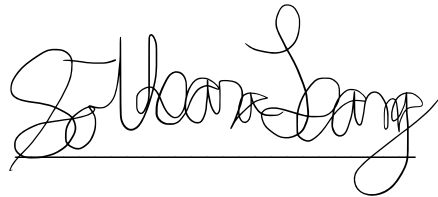
/s/ Anita Taff-Rice

Counsel for One Ring Networks, Inc.

## OFFICER VERIFICATION

I, Sotheara Leang, Vice President of Operations of One Ring Networks, Inc. do hereby declare under penalty of perjury that the above Application is true and correct to the best of my knowledge and belief. Further, I attest that the submission is complete and accurate, with no material omissions.

Executed on August 7th, 2017 at Athens, Texas.

A handwritten signature in black ink, appearing to read 'Sotheara Leang', written over a horizontal line.

Sotheara Leang



## **STATES IN WHICH NUMBERS WILL BE REQUESTED**

- 1) Georgia
- 2) Texas



One Ring Networks  
2030 Powers Ferry Rd SE | Suite 200  
Atlanta, GA 30339

One Ring Networks, Inc.  
2030 Powers Ferry Road SE  
Suite 200  
Atlanta, GA 30339  
(404) 303-9900

To Whom It May Concern:

One Ring Networks certifies the following information:

- One Ring Networks is up to date on our Universal Service Fund contributions.
- One Ring Networks is up to date on our Telecommunications Relay Service contributions.
- One Ring is up to date on, its North American Numbering Plan and Local Number Portability Administration contributions.
- One Ring Networks is up to date on its obligations to pay regulatory fees.
- One Ring Networks is up to date on its 911 obligations under 47 CFR part 9.
- No party to this application is subject to a denial of Federal benefits pursuant to the Anti-Drug Abuse Act (conviction under Federal or State laws for possession or distribution of controlled substances)

If you have any questions or concerns, please contact me at [jjenkins@oneringnetworks.com](mailto:jjenkins@oneringnetworks.com)

Best Regards,

A handwritten signature in black ink, appearing to be 'John Jenkins', written over a large, faint, circular watermark that spans the center of the page.

John Jenkins  
CEO  
One Ring Networks, Inc.



**CONFIDENTIAL EXHIBIT 1**

REDACTED FOR PUBLIC INSPECTION

Confidential Information pursuant to 47 C.F.R. §§ 0.457 and 0.459