



IDT Corporation
520 Broad Street
Newark, New Jersey 07102

August 30, 2017

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

Re: ET Docket No. 04-295
Update to IDT Corporation, System Security and Integrity Plan

Attached, pursuant to 47 C.F.R. § 1.20005, please find an original and four (4) copies of the amended System Security and Integrity Plan of IDT Corporation ("IDT"). IDT is amending its existing policy to reflect changes to contact information and other minor administrative revisions.

IDT provides a REDACTED version of this filing via ECFS and a CONFIDENTIAL version in hard copy to the Secretary's Office. This filing is being submitted as confidential pursuant to 47 C.F.R. § 0.457(d) as trade secrets and commercial information and 47 C.F.R. § 0.457(g) as records compiled for law enforcement purposes, and therefore should not be made available for public inspection. The Commission has acknowledged "the sensitive nature of a carrier's policies and procedures for systems security and integrity."¹ Further, information concerning "business operations and plans" routinely has been withheld as disclosure could damage a company's "competitive position by giving the competitors insight into [the company's] business methods and strategies."² Accordingly, the information designated by IDT as confidential herein is the type of material routinely protected from disclosure under the Freedom of Information Act and the Commission's rules.

In the event this filing is not subject to confidential treatment under Rule 0.457, IDT respectfully requests notice of that determination and an opportunity to make a showing for confidentiality under 47 C.F.R. § 0.459 prior to making this filing available for public inspection.

¹ *Communications Assistance for Law Enforcement Act*, 14 FCC Rcd 4151, ¶ 57 (1999).

² *Josh Wein, Warren Communications News on Request for Inspection of Records*, 24 FCC Rcd 12347, ¶ 13 (2009).

Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,

/s/ Carl Billek

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REDACTED FOR PUBLIC INSPECTION

IDT CORPORATION
POLICIES AND PROCEDURES FOR IMPLEMENTING OBLIGATIONS UNDER THE
COMMUNICATIONS ASSISTANCE FOR LAW ENFORCEMENT ACT
[Last amended August 30, 2017]

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I certify that I have overseen the Surveillance described on this form and on any attached documents, and I further certify that the information contained on this form and the attached documents is complete and accurate.

Printed name of CALEA Administrator:	Carl Billek
Signature:	/s/ Carl Billek
Date:	August 30, 2017