

January 12, 2016

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: Metropolitan Telecommunications – *Response to Federal
Communications Commission Enforcement Bureau
Information Request***

Ms. Dortch:

Metropolitan Telecommunications (“MetTel”), through its undersigned counsel, hereby submits a confidential version of its answers (“Response”) to the Enforcement Bureau’s (“Bureau”) information request to the Company. In addition to the attached, MetTel provides the following information in support of its Response.

It is MetTel’s understanding that the Federal Communications Commission (“Commission,” or “FCC”) generally does not release information provided in response to staff information requests. Therefore, MetTel anticipates that the Commission will keep the Response confidential. Nonetheless, because MetTel’s Response includes commercially sensitive information and trade secret data, MetTel, by counsel and pursuant to 47 C.F.R. §§ 0.457 and 0.459, respectfully requests confidential treatment of the information provided in its Response. This information is competitively sensitive and/or protected by law from disclosure, and its disclosure would have a negative competitive impact on MetTel were it made publicly available.

MetTel considers the confidential information provided in its Response to constitute trade secrets, and commercial information. *See* 47 C.F.R. § 0.457(d). Even if the confidential information provided in the Response is not subject to Section 0.457, the information would be subject to 47 C.F.R. § 0.459. Therefore, to assist the Bureau and clarify what information MetTel considers confidential, the relevant confidential information in the Response has been marked “**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**” In addition, MetTel has provided justification for the confidential treatment of this information in Attachment 1 to this letter.

An additional copy of this letter is being provided, which we request you date-stamp and return.

MetTel is also submitting, via ECFS, a redacted public copy of the letter. The redacted public copy is marked “**REDACTED – FOR PUBLIC INSPECTION.**”

If you have any questions or would like to discuss further, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert H. Jackson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert H. Jackson
Counsel for Metropolitan Telecommunications

Enclosures/ Attachments

Attachment 1

Metropolitan Telecommunications Request for Confidentiality

Metropolitan Telecommunications ("MetTel," or the "Company") respectfully requests confidential treatment of certain information provided in its Response to the Enforcement Bureau's ("Bureau") information request to the Company ("Response"), 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.

47 C.F.R. § 0.457

Specific information in the Response is confidential and proprietary to Company as "trade secrets and commercial or financial information" under 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.

47 C.F.R. § 0.459

Specific information in the Response is also subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

Information for which confidential treatment is sought

The Company requests that specific information in the Response be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential includes the Company's sensitive trade secrets and commercial information, including information about the Company's business structure and strategy. This information is competitively sensitive information that Company maintains as confidential, and is not normally made available to the public. Release of the information would have a substantial negative impact on the Company since it would provide competitors with commercially sensitive information. As required by 47 C.F.R. § 0.459, the Company will indicate confidential information in its Response by marking it "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**"

Commission proceeding in which the information was submitted

The information is being submitted as part of the Company's Response.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The information designated as confidential includes sensitive trade secrets and commercial information. As noted above, 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 the 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 in which MetTel provides telecommunications services 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 the Company's business at a level of detail not currently available to the public.

Measures taken by 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

MetTel has treated and continues to treat the non-public information identified in its Responses 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.

Other information the 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.