

February 24, 2016

VIA ECFS and Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street S.W.
Washington, DC 20554
ATTN: FCC Government Lockbox - P.O. Box 979091

**Re: Application for Approval, as Necessary, to Transfer Control Pursuant to
Section 214 of the Communications Act of 1934, as Amended
IPC Systems, Inc. and Etrali North America, LLC**

Dear Secretary Dortch:

IPC Systems, Inc. (“IPC Systems”) and Etrali North America, LLC (“Etrali”) (together, “Applicants”), by its attorneys, hereby submits the attached application for approval, as necessary, to transfer control of Etrali NA to IPC Systems, pursuant to Section 214 of the Communications Act of 1934, as amended (“Application”). 47 U.S.C. § 214.

Attached please find the redacted public version of the Application. An original and six (6) copies of the unredacted confidential version of the Application and a copy of this letter are concurrently being filed with the Federal Communications Commission’s (“FCC” or “Commission”) Office of the Secretary. The FCC Form 159 and requisite filing fee are being submitted this date via the Fee Filer system.

IPC Systems, pursuant to Sections 0.457 and 0.459 of the FCC’s rules, 47 C.F.R. §§ 0.457 and 0.459, and in accordance with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, hereby requests that the Commission withhold from public inspection and accord confidential treatment to the confidential, commercially sensitive information contained in the confidential version of the Application. Specifically, **Exhibit A** to the Application contains confidential, commercially sensitive information regarding the domestic and international operations and corporate organizational structure of IPC Systems, as well as its parent companies, subsidiaries, and affiliates.

In support of this request for confidential treatment and pursuant to Section 0.459(b) of the Commission’s rules, IPC Systems hereby states as follows:

1. Identification of the Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

IPC Systems seeks confidential treatment of the corporate organizational charts included as Exhibit A to the Application.

2. Description of the Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

The confidential information is being provided to the Commission in support of the Application.

3. Explanation of the Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or is Privileged (Section 0.459(b)(3))

As noted above, the information in Exhibit A contains highly sensitive commercial information. Competitors could use this information to gain an unfair competitive advantage.

4. Explanation of the Degree to Which the Information Concerns a Service that is Subject to Competition (Section 0.459(b)(4))

The market for private line and IP-based transport services is highly competitive throughout the United States.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Competitors could use the disclosed information to gain an unfair advantage over IPC Systems. Specifically, disclosure of this confidential information would provide IPC Systems' competitors with sensitive insights related to the domestic and international operations of IPC Systems, its parent companies, subsidiaries, and affiliates.

6. Identification of Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

IPC Systems has diligently prevented the unauthorized disclosure of the confidential information, and have kept such information confidential unless otherwise required to be disclosed pursuant to applicable governmental regulations.

7. Identification of Whether the Information is Available to the Public and the Extent of any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

The confidential information provided in Exhibit A has not been disclosed to the public and third parties.

8. Period During which Material Should Not be Available for Public Disclosure (Section 0.459(b)(8))

Confidential treatment must be afforded for this information for as long as it would provide a basis for IPC Systems' competitors to gain insight into IPC Systems' business operations. At this time, IPC Systems cannot determine the exact date on which the information provided in Exhibit A could no longer be used by competitors to IPC Systems' detriment.

For the above reasons, IPC Systems respectfully requests that the Commission withhold from public disclosure the confidential, commercially sensitive information contained in Exhibit A to the Application. In accordance with Section 0.459(g) of the Commission's rules, IPC Systems requests telephone and written notification from the Commission if the instant request is denied, so that it may file an Application for Review or request return of the confidential materials pursuant to Section 0.459(e) of the Commission's rules.

Respectfully submitted,

/s/

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Susan C. Goldhar Ornstein
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Etrali North America, LLC*