

JONES DAY

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March 15, 2013

CONFIDENTIALITY REQUEST PURSUANT TO 47 C.F.R. § 0.459

VIA HAND DELIVERY

Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

FILED/ACCEPTED

MAR 15 2013

Federal Communications Commission
Office of the Secretary

Re: Five9, Inc. Request for Review of Universal Service Administrator Decision

Dear Ms. Dortch:

Five9, Inc. ("Five9"), through its legal counsel, Jones Day, hereby requests that the unredacted version of its Request for Review of the January 18, 2013 decision ("January Decision")¹ of the Universal Service Administrative Company ("USAC"), be held in confidence and not made available for public inspection pursuant to Section 0.459 of the Federal Communications Commission's rules, 47 C.F.R. § 0.459. Confidential treatment, with respect to the materials identified herein, is fully consistent with past Federal Communications Commission ("FCC") practice. Five9 has also filed a redacted version that may be treated as public. In support of this request, Five9 provides the following information, as required under Section 0.459(b) of the FCC's Rules:

- 1. *Specific Information for Which Confidential Treatment is Sought - § 0.459(b)(1)*:** Five9 has submitted a redacted and unredacted Request for Review. Five9 requests confidential treatment for the unredacted Request for Review, including Exhibits A, B and C thereto.
- 2. *Circumstances Giving Rise to the Submission - § 0.459(b)(2)*:** This filing is being made to the Commission as a Request for Review of a Decision of the Universal Service Administrator.

¹ See Response to Letter dated December 17, 2012 regarding the Federal Universal Service Filing and Contribution Obligations of Five9, Inc., from USAC, dated January 18, 2013, ("January Decision") attached as Exhibit A.

3. Degree to which the Information is Commercial or Financial, or Contains a Trade Secret or is Privileged - § 0.459(b)(3): The redacted portions of Five9's Request for Review and Exhibits A, B and C thereto contain arguments and facts that include confidential, non-public information that is financial in nature or is otherwise privileged. As a privately-held company, Five9's commercial and financial information is unavailable to the public in the normal course of business, has not been otherwise disclosed to the public (nor to any third-party unless covered by appropriate confidentiality obligations) and Five9 requests that the FCC afford confidential treatment to these portions of the Request for Review.

Information concerning Five9's conversations with USAC, business practices, and financial information are all privileged and must be kept confidential as it is commercially competitive and privileged. Many of these confidentiality requests stem from the confidential nature of specific issues and facts related to a confidential proceeding.

4. Degree to which the Information Concerns a Service that is Subject to Competition - § 0.459(b)(4): The cloud-based call center software industry is rapidly growing and increasingly competitive, and the provision of telecommunications services in support thereof is a competitive discriminator within the industry. The commercial provision of cloud-based call center software services is currently expanding, with an increase in consumer demand for cloud-based services. Five9 believes that this specific area of services will continue to attract new competitive offerings. All of the information and documents discussed in Section 3 above provides insight into the manner in which Five9 conducts and plans its business and is, as a result, proprietary, highly confidential and sensitive.

5. How Disclosure of the Information Could Result in Substantial Competitive Harm - § 0.459(b)(5): The disclosure of the information and confidential materials set forth herein to competitors would give such competitors significant advantages in developing similar services, pricing their competitive services, and gaining insight into Five9's business, customers, cost structure and revenues. Access to financially sensitive information of a privately held company would put Five9 at an extreme competitive disadvantage with its customers and competitors by disclosing closely guarded trade secrets. Additionally, denying confidential treatment to a privately-held company regarding information that is commercial in nature gives competitors a distinct and direct advantage over Five9 in the cloud-based call center software services market.

6. Measures Taken by Five9 to Prevent Unauthorized Disclosure - § 0.459(b)(6): § 0.459(b)(6): As a privately held company, Five9 restricts the use and disclosure of any and all proprietary and financial information. Five9 requires all employees, consultants and other service providers to sign non-disclosure agreements to prevent these parties from disclosing Five9's confidential information. Five9 also requires its business partners and customers to enter into separate confidentiality agreements and/or includes confidentiality clauses in its contracts with such parties. Finally, Five9 has limited access to the enclosed materials solely to those officers, directors, employees, contractors and consultants who require knowledge of such materials, and none of the materials have previously been publicly disclosed.

7. *The Information Submitted is Not Available to the Public and has Not Previously Been Disclosed to Third Parties, Except for Appropriately Limited Circumstances - § 0.459(b)(7):* As stated in response to Sections 4, 5 and 6 above, because Five9 is a privately-held company, none of the redacted information included herein has been publicly disclosed, nor has such information been otherwise disclosed to any third-party unless covered by appropriate confidentiality obligations. Many of these confidentiality requests stem from the confidential nature of specific issues and facts related to a confidential proceeding.

8. *Period During which the Submitted Material Should Not be Available for Public Disclosure - § 0.459(b)(8):* Five9 respectfully requests that its request for review and the confidential materials attached thereto be permanently kept confidential until Five9 notifies the FCC that confidential treatment is no longer required.

9. *Other Information Supporting Request For Confidential Treatment - § 0.459(b)(9):* Five9 has contracts with third-party customers, suppliers and partners that contain confidentiality clauses to preclude disclosure of a wide variety of business and financial information. Publication of responses to those questions identified above and the confidential materials attached hereto would cause substantial harm to both Five9 and its third-party partners. Such public disclosure would damage Five9's relationship with these third-parties and make it more difficult or costly for Five9 to enter into such agreements with these or other parties in the future. In addition, such disclosure would in many cases cause Five9 to breach its contractual confidentiality obligations to such parties, which could lead to termination of such contracts and damages, either of which could cause substantial harm to Five9.

* * * * *

For the foregoing reasons, Five9 requests that the FCC withhold the materials identified herein from public inspection and accord them full confidential treatment. Five9 further requests that, in the event that disclosure of the attached copies of these documents is ultimately found necessary, any party ultimately examining such documents be required to enter into an appropriate protective order.

Should you have any questions or concerns regarding this request for confidentiality or any materials enclosed herein, please do not hesitate to reach me at (202) 879-7600 or delsmith@jonesday.com. If I am not available, please feel free to contact my colleague, Jason Taub, at (202) 879-3866 or jtaub@jonesday.com. If Five9's confidentially request is rejected in part or in whole, I kindly request that you contact me to further discuss the confidential nature of the items set forth herein. We look forward to continuing to work with the Federal Communications Commission on this matter.

Marlene H. Dortch
March 15, 2013
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JONES DAY

Sincerely,

A handwritten signature in black ink, appearing to read "D.D. Smith", with a long horizontal flourish extending to the right.

Delbert D. Smith

Enclosures: Five9 Request for Review

cc: Theresa Z. Cavanaugh, FCC
Pamela Kane, FCC
Pam Slipakoff, FCC
William Kehoe, FCC
Kristin Berkland, USAC

FILED/ACCEPTED

MAR 15 2013

Federal Communications Commission
Office of the Secretary

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

In the Matter of)
)
)
Request for Review by Five9, Inc.) WC Docket No. 06-122
of Decision of Universal Service)
Administrator)
)

**REQUEST FOR REVIEW OF DECISION OF UNIVERSAL SERVICE
ADMINISTRATOR
EXPEDITED ACTION REQUESTED**

Five9, Inc. (“Five9”), by and through its attorneys and pursuant to Sections 54.719(c), 54.721, and 54.722 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ respectfully requests review of the January 18, 2013 decision (“January Decision”)² of the Universal Service Administrative Company (“USAC”) that denied Five9’s request for a credit for the federal Universal Service fees Five9 paid to its underlying carriers for interstate and international telecommunications services.³ As discussed below, Five9 requests that the Commission order USAC to credit Five9 for the Universal Services fees it paid to its underlying carriers from 2008-2012. Five9 also requests that the Commission, pursuant to § 1.3⁴, waive any late payment penalties to be assessed under § 54.713(b)⁵ on the amount at controversy in this appeal. Five9 requests expedited review of this request because Five9 expects USAC to issue an invoice in April 2013 for Five9’s 2008-2012 USF contributions. For the reasons provided below, Five9 respectfully requests that the Commission grant the requested relief.

¹ 47 C.F.R. §§ 54.719(c), 54.721& 54.722.

² See Response to Letter dated December 17, 2012 regarding the Federal Universal Service Filing and Contribution Obligations of Five9, Inc., from USAC, dated January 18, 2013, attached as Exhibit A.

³ See Exhibit A at 2-5.

⁴ 47 C.F.R. § 1.3

⁵ 47 C.F.R. § 54.713(b)

REDACTED – FOR PUBLIC DISCLOSURE

I. STATEMENT OF FACTS

Five9 is a cloud-based provider of software services headquartered in California whose services are used by its customers both in the United States and in other countries to create virtual call centers in the cloud. Five9 is a growing company with a commitment to continue hiring workers in the United States. In connection with its provision of virtual call center software services, Five9 also provides telecommunication services to virtually all of its customers, which are used by the customers to access Five9's servers to support inbound and outbound calls between the customer's agent and the consumer. Five9 maintains no telecommunications facilities of its own, but instead buys telecommunications services from wholesale carriers and resells them to its customers.

Founded in 2001, Five9 began to sell its software and provide supporting telecommunications service in 2003. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Although Five9 was not registered with USAC, from the outset its wholesale carriers charged Universal Service fees and certain other FCC support mechanisms for interstate and international telecommunications services provided to Five9. Five9 paid such fees to its providers as an end user of telecommunications services. Therefore, even though at the time Five9 did not consider itself to be a telecommunications provider, Five9 contributed from 2003 through 2012 to the Universal Service Fund ("USF" or the "Fund") via the Universal

REDACTED – FOR PUBLIC DISCLOSURE

Service fees it was charged by its wholesale carriers. In fact, from 2008 to 2012, Five9 paid more than [REDACTED] in USF fees to its wholesale carriers.⁶

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] On

December 17, 2012, Five9 made its registration with USAC, filing a 2012 499-A for calendar year 2011 and 499-Qs covering calendar year 2012 and the first quarter of calendar year 2013.

At the time it made its registration, Five9 informed USAC that, while Five9 is prepared to recognize its obligation to make USF contributions, Five9 had already contributed to the federal Universal Service support mechanisms through federal USF fees paid to its underlying carriers. Five9 requested USAC to credit it for such indirect payments to the USF against its invoices for contributions on end user revenues.

⁶ See Exhibit B and Exhibit C

⁷ 47 C.F.R. § 64.1195.

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In the January Decision, USAC denied Five9's request for a credit stating that Five9's "recourse lies with the underlying carrier" not a credit on its USAC invoice.⁸ USAC did not even acknowledge in the January Decision [REDACTED] [REDACTED]. The January Decision relied on a 2007 Wireline Competition Bureau (the "Wireline Bureau") decision that established the general principle that resellers may not contractually shift their regulatory obligation to contribute to the USF to their supplying carriers given the fact that the Commission has established a certification procedure by which supplying carriers can determine contemporaneously whether their customers are exempt from USF assessment because they are themselves direct contributors to the Fund.⁹ In the *ATS Order*, the Wireline Bureau agreed with USAC that it would face a daunting administrative burden to assure itself that a reseller's supplying carriers had, in fact, contributed to the Fund on behalf of the reseller customer, a determination that the Wireline Bureau surmised would require USAC to audit payments received, reported and contributed by the supplying carriers.¹⁰ The Wireline Bureau concluded in *ATS* that the reseller's proper recourse was not in receiving a credit from USAC for payments its wholesale carriers had made on its behalf to the Fund, but through private litigation against the supplying carriers in the courts.¹¹ The January Decision concluded that USAC was "mandated" by the *ATS Order* to deny Five9's request for a credit because its proper recourse, if any, lay in pursuing claims against its supplying carriers.¹²

⁸ See Exhibit A at 5.

⁹ *In the Matter of Federal-State Joint Board on Universal Service American Telecommunications Systems, Inc., Equivoice, Inc., Eureka Broadband Corporation, Ton Services, Inc., Value-Added Communications, Inc.*, CC Docket No. 96-45, Order, DA 07-1306, 22 FCC Rcd 5009 (2007) ("*ATS Order*").

¹⁰ *Id.*, ¶ 13.

¹¹ *Id.*, ¶ 14.

¹² See Exhibit A at 5.

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II. ARGUMENT

A. **Five9 is entitled to receive a credit for the USF fees it paid from 2008-2012.**

The *ATS Order* on which USAC relied in the January Decision has been superseded in relevant part, for purposes of this Request for Review, by a more recent and comprehensive restatement of policy by the full Commission regarding the USF contribution obligations of wholesale providers and their reseller customers.¹³ Because USAC's January Decision failed to consider the impact of the Commission's *Wholesale-Reseller Order*, it is inherently flawed and cannot be applied as applicable precedent.

1. **Double Collection of USF Fees is Against Commission Policy.**

In the *Wholesale-Reseller Order*, the Commission clarified that it is against Commission policy for USAC to double collect USF fees if another provider has already contributed on the subject revenues. In the *Wholesale-Reseller Order*, the Commission held that "if a wholesale provider's customer actually contributed [to the USF], USAC should not attempt to recover contributions from the wholesale provider on the subject revenues."¹⁴ The Commission's conclusion in the *Wholesale-Reseller Order* was a logical outgrowth of the Commission's long-established policy, adopted from its earliest interpretation of the 1996 Telecommunications Act that established the current USF regime, that revenues should be assessed only once along the distribution chain for USF contribution purposes.¹⁵ While the *Wholesale-Reseller Order* discusses double contributions from the wholesale provider's

¹³ *In the Matter of Universal Service Contribution Methodology Application for Review of the Decision of the Wireline Competition Bureau filed by Global Crossing Bandwith, Inc., Request for Review of the Decision of the Universal Service Administrator and Emergency Petition for Stay by U.S. TelePacific Corp. d/b/a TelePacific Communications, XO Communications Services, Inc. Request for Review of Decision of the Universal Service Administrator, Universal Service Company Request for Guidance*, WC Docket No. 06-122, Order, FCC 12-134, 27 FCC Rcd 13780, 13799-800, ¶¶ 43-46 (2012) (*Wholesale-Reseller Order*).

¹⁴ *Wholesale-Reseller Order* at ¶ 44.

¹⁵ *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 18400, 18507 (1997); *Wholesale-Reseller Order*, ¶¶ 11, 44.

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perspective, the Commission’s policy against collecting double contributions applies equally to the facts presented in this Request for Review. Five9 has already made contributions to the Fund through its carriers and should not be assessed for double contributions on those revenues.

Given this fundamental policy of the USF program, the Wireline Bureau’s holding in the *ATS Order* that reseller’s cannot “contract away” their regulatory obligation to contribute to the USF represents a flawed and inherently inequitable gloss. Similarly, its conclusion that a reseller’s only recourse is through legal action against its supplying carriers is overly facile and dismissive of Five9’s equitable interests. By invoking the *ATS Order* as its sole authority in such a superficial manner, USAC is defying the Commission’s recent policy reaffirmation that double assessment of the same revenue is contrary to the intent and implementation of the USF program. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. USAC Is Not Required to Conduct Audits in Order to Fulfill the Commission’s Policy Against Double Payments.

USAC can support the Commission’s policy against double assessment of telecommunications revenues without assuming the onerous administrative burden of conducting audits of both Five9 and its supplying carriers as the Wireline Bureau had anticipated would be required in the *ATS Order*. In its recent *Wholesale-Reseller Order*, the full Commission outlined a more expeditious and pragmatic approach that USAC may use to confirm that USF contributions have already been made by a carrier on revenue in the resale chain.

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Addressing a series of appeals claiming that USAC was attempting to assess the same revenue twice, the Commission imposed the burden of proof “on the provider claiming double collection to demonstrate that contributions were made to the Fund based on the relevant services through clear and convincing evidence.”¹⁶ The Commission explained that this standard is necessary “to ensure that the no-double-collection exception does not swallow the rule of complying with universal service contribution obligations in the first place.”¹⁷ Significantly, the Commission clarified that, “beyond checking its own records, [USAC] is not required to conduct additional independent investigation of the wholesale provider’s customers in making [the] determination” of whether a reseller actually contributed to the Fund. Specifically, USAC was instructed by the Commission to “consider the evidence offered by the wholesale provider, including sworn reseller certificates.”¹⁸ According to the Commission, such certificates, which the Commission refers to as “confirmatory certificates”, are appropriate and sufficient evidence that a USF contribution was made by another provider.¹⁹ Moreover, confirmatory certificates do not have to be generated contemporaneously at the time of contribution to the Fund, but can be created subsequently as confirmation of the contribution made.

Five9 submits that, as the provider claiming double collection, it has met the burden of clear and convincing evidence of the payments it has made indirectly to the Fund from 2008 through 2012 by securing confirmatory certificates from its individual supplying carriers that attest, under penalty of perjury, the total USF charges billed to and collected from Five9 on an annual basis (see confirmatory certificates attached as Exhibit B). The confirmatory certificates further confirm the name and USAC ID registration number for the

¹⁶ *Wholesale-Reseller Order*, at ¶ 45.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Wholesale-Reseller Order* at ¶ 45.

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year in question for the certifying carrier, as well as the newly issued USAC ID registration number for Five9 as the carrier claiming double payment. Using this data, USAC can with relatively little effort “check its own records” to confirm that the certifying wholesale carriers were direct contributors to the Fund in the years covered by the certifications.

The Commission is clear that, where evidence shows that a contribution had been made by one provider, USAC should not seek a double contribution from another provider.²⁰ In this case, Five9 paid USF charges to its supplying carriers.²¹ The underlying providers then contributed those same Universal Service Fund charges paid by Five9 to the USF.²² Therefore, a contribution was made by a provider on the revenues subject to this request for review, and it is against Commission policy for USAC to now collect those same contributions from Five9.

Five9 accepts the burden of proof for demonstration of double USF payments established by the Commission in the *Wholesale-Reseller Order* and believes it has met such burden though the provision of the attached confirmatory certificates. It is not seeking a credit for all of the USF payments it made to its supplying carriers during the period in question, but only for the USF payments that the confirmatory certificates demonstrate were made on its behalf from 2008 through 2012 (see Summary Schedule of Wholesale Provider Payments attached as Exhibit C).²³ In fact, Five9 will not be able to obtain confirmatory certificates from at least one wholesale carrier and will, therefore, not be asking for a credit

²⁰ *Wholesale-Reseller Order* at ¶¶ 43-46.

²¹ See Exhibit B.

²² See Exhibit B.

²³ Five9 does not intend to ask USAC to credit Five9 for the entire amount itemized in the confirmatory certificates because Five9 was an end user of a small portion of the services provided by the wholesale carriers. As a result, Five9 was not required to directly contribute to the USF for those services and appropriately paid USF fees to its wholesale carriers. Therefore Five9 will reduce the requested USF credit by the USF fees paid to the wholesale carriers for the end user services. Five9 is prepared to offer clear and convincing evidence to USAC on this subsidiary issue, as well.

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for those Universal Service fee payments. Moreover, Five9 is not disputing USAC's assessment of USF charges for its end user telecommunications revenues from 2008 through 2012; instead, it is simply seeking a credit against those charges for contributions already made on its behalf.²⁴

Effectively, Five9 has sought, and secured, relief from its supplying carriers for the double payments as addressed in the *ATS Order*. Moreover, it has done so in a manner sanctioned by the full Commission in its recent *Wholesale-Reseller Order*.

Under these circumstances, it would be inherently unfair, and contrary to the Commission's disapproval of double assessments, for USAC to refuse to consider the clear and convincing evidence of payments already made by Five9 in the form of the attached confirmatory certificates. USAC's instruction to Five9, following the outdated relief mechanism outlined in the *ATS Order*, to pursue separate lawsuits against each of its supplying carriers would constitute an unnecessarily expensive, time-consuming and hostile legal process when contrasted to the cooperation that Five9's supplying carriers have demonstrated by attesting under oath to the payments they have made to the Fund for services sold to Five9. This would be a particularly inequitable result given [REDACTED] [REDACTED] from 2008 to the present. USAC should be instructed to consider the clear and convincing evidence of double payments provided by Five9 and credit Five9 for those USF double payments against its invoiced amounts for contributions on end user revenues from 2008 through 2012.

²⁴ As of January 1, 2013, Five9 has executed exemption certificates and will not need to seek any USF credits after December 31, 2012.

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B. The Commission should waive any late payment penalties on the USF contributions subject to this request for review.

Five9 requests that the Commission waive any late payment penalties which may accrue on the USF contributions subject to this request for review. Under § 54.713(b), Five9 will inevitably accrue late payment penalties while the Commission considers this request for review.

The Commission may waive its rules for “good cause shown.”²⁵ More specifically, the Commission may exercise its discretion to waive a rule where, due to special circumstances, deviation from the general rule would better serve the public interest than strict adherence to the general rule.²⁶ The Commission may take into account consideration of hardship, equity, or more effective implementation of overall policy on an individual basis.²⁷

Special circumstances exist in this case because, from 2003 through most of 2012, Five9 believed, in good faith and [REDACTED], that it was an end user of telecommunications services. Five9 was treated as an end user by its supplying carriers and paid fees to those carriers for contributions to the USF. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

.²⁸

²⁵ 47 C.F.R. § 1.3.

²⁶ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

²⁷ *WAIT Radio*, 418 F.2d at 1159; *Northeast Cellular*, 897 F.2d at 1166.

²⁸ See *Universal Service Contribution Methodology; Federal-State Joint Board on Universal Service; Requests for Review of Decisions of Universal Service Administrator by AT&T, Inc., Eureka Broadband Corporation, WC Docket No. 06-122, CC Docket No. 96-45, Order, 25 FCC Rcd 10855 (Wireline Comp. Bur. 2010) (“AT&T”).* ¶¶ 1 & 4.

REDACTED – FOR PUBLIC DISCLOSURE

The equities also weigh in favor of waiving the late payment penalties. If the Commission does not waive these late payment penalties, Five9 will have to either pay the full amount invoiced by USAC or risk accruing late payment penalties. It is inequitable for Five9 to have to risk paying late payment penalties on the contributions it is appealing. Five9 is within its rights under the regulations to appeal USAC's January Decision²⁹, and Five9 should not be adversely impacted because it chose to exercise its rights under the regulations. In addition, any late payment penalties would inevitably [REDACTED]

[REDACTED]. Finally, the Commission's waiving of any late payment penalties will also lead to more effective policy implementation. If the Commission grants this waiver, similarly situated companies will be encouraged to voluntarily come forward and work with the Commission to reach compliance.

III. CONCLUSION

For the foregoing reasons, the Commission should order USAC to credit Five9 for the Universal Service Fund charges it made to its underlying carriers. The Commission should further waive any late payment penalties associated with the subject revenues. Finally, Five9 requests that the Commission act on this Request for Review expeditiously in order to mitigate the accrual of late charges assessed by USAC while this Request is considered.

²⁹ See 47 C.F.R. §§ 54.719(c), 54.721 & 54.722.

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Respectfully Submitted,

FIVE9, INC.

/s/ Delbert D. Smith

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Attorneys for Five9, Inc.

March 15, 2013

cc: Theresa Z. Cavanaugh (FCC)
Pamela Kane (FCC)
Pam Slipakoff (FCC)
William Kehoe (FCC)
Kristin Berkland (USAC)

REDACTED – FOR PUBLIC DISCLOSURE

EXHIBIT A

REDACTED

REDACTED – FOR PUBLIC DISCLOSURE

EXHIBIT B

REDACTED

REDACTED – FOR PUBLIC DISCLOSURE

EXHIBIT C

REDACTED

REDACTED – FOR PUBLIC DISCLOSURE

CERTIFICATE OF SERVICE

I, Britney Edwards, hereby certify that on this 15th day of March 2013, I caused a copy of the foregoing Request for Review of Universal Service Administrator Decision by Five9, Inc. in WC Docket No. 06-122 to be sent to Theresa Z. Cavanaugh (FCC), Pamela Kane (FCC), Pam Slipakoff (FCC), William Kehoe (FCC), and Kristin Berkland (USAC).

/s/ Britney Edwards
Britney Edwards