



Conexions, LLC d/b/a Conexion Wireless
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FILED/ACCEPTED

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NOV 24 2009

November 23, 2009

Federal Communications Commission
Office of the Secretary

Via Hand Delivery
Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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Re: Conexions, LLC, d/b/a Conexion Wireless
Petition for Forbearance from Own-Facilities Requirement (filed July 8, 2009)
Petition for Designation as an Eligible Telecommunications Carrier (filed Oct. 7, 2009) – WC Docket No. 09-197

~~CONFIDENTIAL – NOT FOR PUBLIC INSPECTION~~

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Dear Ms. Dortch:

Conexions, LLC, d/b/a Conexion Wireless (“Conexion”) submits this information in response to an inquiry from Wireline Competition Bureau staff related to the above-referenced petitions.

Confidential treatment is requested for certain data provided in this letter, pursuant to Section 0.459 of the Commission’s rules.¹ The confidential information is clearly marked below. The marked information is sensitive company information not available to the public, including competitively sensitive information about Conexion’s market plans and business strategy.

As required by Section 0.459(b) of the Commission’s rules, Conexion provides the following information regarding its request for confidential treatment:

1. Confidential treatment is requested for Conexion’s strategy for applying for ETC status in additional states and Conexion’s projected Lifeline subscriber numbers.
2. This information is submitted in response to a staff inquiry in connection with the above-referenced petitions.
3. The information regarding Conexion’s market entry plans and subscriber projections is commercially and financially sensitive, is a trade secret, and is privileged. The information is not generally publicly available.
4. The wireless telecommunications industry is highly competitive.² There is competition in the provision of wireless Lifeline services from standard wireless ETCs and the special Lifeline ETCs that have already been designated.

¹ 47 C.F.R. § 0.459.

² See generally *Thirteenth Annual CMRS Competition Report*, 24 FCC Red 6185 (2009).

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5. The release of this information will cause substantial competitive harm to Conexion. Disclosure of Conexion's market entry strategy and projected subscriber counts would give Conexion's competitors access to privileged information that would affect the actions of those competitors. Competitors seeking to compete with Conexion could utilize such information to position their entry or pricing and/or extrapolate sensitive data regarding Conexion's financial condition and plans for the future.
6. Conexion considers this information to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
7. This information is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel.
8. The information provided in the Petition for Waiver should not be released for public inspection, as this document contains proprietary company information that is competitively and financially sensitive and a trade secret. At some point, however, this information will become stale. At minimum, the financial information in this Petition for Waiver should be protected for not less than three years.

For the foregoing reasons, Conexion respectfully requests that the Commission provide for confidential treatment for the identified information in this letter.

Conexion provides the following responses to the staff's questions:

1. What underlying network(s) will Conexion use to provide Lifeline service?
Response: Conexion will use the networks of Sprint Nextel and Verizon Wireless.

2. List the states where Conexion has already filed for eligible telecommunications carrier (ETC) status. Response: In Conexion's above-referenced petition for designation as a special Lifeline ETC, Conexion has requested designation in Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, Virginia, and the District of Columbia. Conexion has not filed for ETC designation in any other states.

3. List the states where Conexion plans to file for ETC status. Response:
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[END CONFIDENTIAL]

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4. Provide a projection of the number of subscribers per ETC state that you expect to have at a defined date after designation. Response:

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

These subscribers will benefit from the superior pricing and innovative distribution platform offered by Conexion (as described in the Petitions). These subscribers also will help remedy the chronic under-subscription in the Commission's Lifeline support program.

Respectfully submitted,



Brian Cox
President

cc (by email): Nicholas Degani