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November 29, 2011

BY ECFS AND HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Request for Confidential Treatment of Internet-Based TRS
Certification Application of URrelay, Inc. G Docket No. 10-51**

Dear Ms. Dortch:

On behalf of URrelay, Inc. ("URrelay"), this letter requests confidential treatment of the designated portions of the Internet-Based TRS Certification Application of URrelay, Inc., including Exhibits A-D and G-J, filed on November 28, 2011 ("Certification Application"). The designated portions of the Certification Application and Exhibits A-D and G-J contain confidential and proprietary business information. Accordingly, pursuant to Section 0.459 of the Commission's rules,¹ URrelay requests that the designated portions of the Certification Application and Exhibits A-D and G-J be withheld from public inspection under the Commission's rules.

The information contained in the designated portions of the Certification Application and Exhibits A-D and G-J is proprietary and competitively sensitive information that is not customarily disclosed to the public or within the industry. The confidential documents reveal details about URrelay's business set-up, practices and activities, the disclosure of which would cause harm to URrelay. This information is not ordinarily made available to the public by URrelay. The information in the designated portions of the Certification Application and Exhibits A-D and G-J is not part of the public record in any jurisdiction. Moreover, failure to

¹ 47 C.F.R. § 0.457 and 47 C.F.R. § 0.459.

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treat URrelay's business information as confidential would provide competitors with an unfair competitive advantage by being granted access to URrelay's proprietary information.

Such competitively sensitive information is exempted from mandatory disclosure under "Exemption 4" of the Freedom of Information Act ("FOIA"),² and Section 0.457(d) of the Commission's rules.³ Exemption 4 allows the withholding of commercial or financial information that is privileged or confidential.⁴ The confidentiality requirement is satisfied if substantial competitive injury would likely result from disclosure.⁵ URrelay has taken steps to safeguard all of the confidential information from disclosure, and public disclosure of the information identified herein will cause substantial competitive and financial harm to URrelay,⁶ more than satisfying the Exemption 4 standard for nondisclosure⁷ as well as the criteria set forth in Section 0.459(b) of the Commission's rules.⁸ URrelay accordingly requests that the designated portions of the Certification Application and Exhibits A-D and G-J be withheld from public inspection.

In the event that any person or entity requests disclosure of the confidential documents, please notify counsel for URrelay immediately in order to permit it to oppose such request or take such other action to safeguard its interests as it deems necessary. After the Commission concludes its review process, URrelay requests the return of the confidential information to counsel. However, in the event the Commission has reason to keep the confidential materials after the conclusion of this investigation, URrelay requests that all material be kept under protective seal.

² 5 U.S.C. § 552(b)(4).

³ 7 C.F.R. § 0.457(d). *See National Parks and Conservation Ass'n. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); *Southern Company Request for Waiver of Section 90.629 of the Commission's Rules*, 14 FCC Rcd 1851, 1860 (1998) ("Southern Company").

⁴ 5 U.S.C. § 552(b)(4).

⁵ *Public Citizen Research Group v. FDA*, 704 F.2d 1280, 1290-91 (D.C. Cir. 1983) ("*Public Citizen*").

⁶ *See National Parks*, 498 F.2d at 770; *Southern Company*, 14 FCC Rcd at 1860.

⁷ *See Public Citizen*, 704 F.2d at 1290-91.

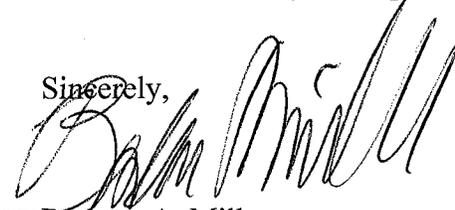
⁸ 7 C.F.R. § 0.459(b).

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Please direct any questions as to this matter, including the request for confidential treatment, to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara A. Miller". The signature is fluid and cursive, with the first name "Barbara" being more prominent and larger than the last name "Miller".

Barbara A. Miller

Counsel to URrelay, Inc.

cc: Greg Hlibock
Joel Gurin
Karen Peltz
Michael Jacobs
William Freedman