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December 31, 2011

FCC Mail Room

**By United Parcel Service**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: Confidentiality Request; NetworkIP, LLC; FCC Certification for the Third Quarter of 2011; WC Docket No. 05-68

Dear Ms. Dortch:

Please find enclosed NetworkIP, LLC's ("NetworkIP's") prepaid calling card FCC Certification for the third quarter of 2011 ("FCC Certification"). Please note that effective January 1, 2009 NetworkIP, LLC (Filer ID 820455 and FRN 0004337572) began submitting consolidated filings for Universal Service Fund reporting purposes under Network Enhanced Telecom, LLP (Filer ID 825346 and FRN 0013243571). NetworkIP, by its counsel and pursuant to Sections 0.457(d) and 0.459 of the Commission's rules, hereby requests confidential treatment of its FCC Certification submitted concurrently with this request.

The FCC Certification is entitled to such treatment under 47 C.F.R. § 0.459(b) for the following reasons:

1. The information for which confidential treatment is requested contains percentage breakdowns of NetworkIP's third quarter prepaid calling card minutes and revenue.
2. The FCC Certification is submitted to the FCC pursuant to the requirements of Section 64.5001(c) of the Commission's rules.
3. The FCC Certification contains confidential commercial information afforded a high level of protection by law.
4. The prepaid calling card services at the core of this matter are widely subject to competition from many sources.
5. NetworkIP stands to suffer significant harm should its competitors and other third parties gain access to information concerning the percentage breakdowns



of NetworkIP's third quarter prepaid calling card minutes and revenue. NetworkIP's competitors would be able to benefit from disclosures of this information to the disadvantage of NetworkIP.

6. In order to prevent unauthorized disclosure, NetworkIP has not disclosed the information for which confidentiality is requested to anyone except the Commission and, as required by Section 64.5001(a) of the Commission's rules, its underlying carriers.
7. The information contained in this response is not available to the public and has not been previously divulged to the public.
8. Because the information contained herein consists of confidential information, NetworkIP requests that the material referenced herein remain confidential indefinitely.

Should you require further information, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tim Martin", is written over a light blue horizontal line.

Tim Martin  
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E-mail: [regulatory@networkip.net](mailto:regulatory@networkip.net)

Enclosures

