IDT Telecom, Inc.
550 Broad Street
Newark, New Jersey 07102-3111

**REDACTED FOR PUBLIC INSPECTION**

June 3, 2013

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

**Re: IDT Telecom, Inc. Quarterly PIU Report for January – March 2013**
**WC Docket No. 05-68**

Dear Secretary Dortch:

On behalf of IDT Telecom, Inc. ("IDT"), please find attached a redacted, public version as well as a confidential version of the Officer Certification required in WC Docket No. 05-68 for the period of January – March 2013.

IDT, by its counsel and pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459 (1994), hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. This Certification contains information regarding IDT's calling card traffic patterns and revenue – information that would not otherwise be available to the public. Due to the confidential nature of such information, IDT hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. Accordingly, the attached Certification of IDT has been marked **"CONFIDENTIAL – NOT FOR PUBLIC INSPECTION."** IDT provides justification for the confidential treatment of this information in Attachment 1 to this letter. IDT is also submitting, for inclusion in the Commission's public files, a redacted version of this Certification. The redacted version is marked **"REDACTED – FOR PUBLIC INSPECTION,"** with the confidential information redacted.

For both versions of this filing, IDT is providing an original and four copies and, for both versions, an extra copy of each to be stamped and returned to the carrier.

Should you have any questions concerning this filing or the request for confidentiality, do not hesitate to contact me at Carl.Billek@idt.net or (973) 438-4854.

Sincerely,

Carl Wolf Billek
IDT Telecom, Inc.

Enclosure

cc: Chief, Pricing Policy Division, Wireline Competition Bureau,
Federal Communications Commission
Best Copy and Printing, Inc. (FCC@BCIWeb.com)

# ATTACHMENT 1

## Confidentiality Justification

IDT requests confidential treatment of the information being provided in its Prepaid Calling Card Provider FCC Quarterly Certification ("Certification") because this information is sensitive and its disclosure would have a negative impact on IDT were it made publicly available. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§ 0.457, 0.459.

47 C.F.R. § 0.457

Specific information in the Certification is confidential and proprietary to IDT as "trade secrets and commercial or financial information" under 47 C.F.R. § 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with IDT's ongoing business and operations.

47 C.F.R. § 0.459

Specific information in the Certification is also subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

Information for which confidential treatment is sought

IDT requests that specific information made in the Certification, marked as "**[REDACTED]**" to be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential is information regarding IDT's percentage of intrastate, interstate and international calling card minutes. This information is competitively sensitive information that IDT maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on IDT since it would provide competitors with commercially sensitive information. The non-redacted version of IDT's filing is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**."

Commission proceeding in which the information was submitted

The information is being submitted as IDT's Certification in WC Docket No. 05-68.

Degree to which the information in question is for commercial or financial, or contains a trade secret is privileged

The information is designated as confidential is information regarding IDT's percentage of intrastate, interstate and international calling card minutes. This information is competitively sensitive information that IDT maintains as confidential and is not normally made available to the public as release would have a substantial negative competitive impact on IDT.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm.

The release of this confidential and proprietary information would cause IDT competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of IDT's business.

Measures taken by IDT to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosures of the information to third parties.

IDT has treated and continues to treat the non-public information disclosed in the Certification as confidential and has protected it from public disclosure to parties outside the company.

Justification of the period during which IDT asserts that the material should be available for public disclosure.

IDT cannot determine at this time any date on which this information should not be considered confidential.

Other information IDT believes may be useful in assessing whether its request for confidentiality should be granted.

Under applicable Commission decisions, the information in question should be withheld from public disclosure.

**REDACTED – FOR PUBLIC INSPECTION**

**Prepaid Calling Card Provider FCC Quarterly Certification WC Docket No. 05-68**

**CERTIFICATION OF IDT TELECOM, INC.**

1. Pursuant to 47 C.F.R. § 64.5001(c), the undersigned hereby certifies that they are an officer of IDT Telecom, Inc. and that to the best of my knowledge, information or belief, all statements of fact contained in this certification are true and that said certification is an accurate statement of the data set forth herein for the reporting period of January – March 2013.

2. The following is the percentage of intrastate, interstate and international calling card minutes for the above-stated reporting period:

   a. Percentage of intrastate calling card minutes: **[REDACTED]**
   b. Percentage of interstate calling card minutes: **[REDACTED]**
   c. Percentage of international calling card minutes: **[REDACTED]**

3. The percentage of total prepaid calling card service revenue (excluding revenue from prepaid calling cards sold by, to, or pursuant to contract with the Department of Defense (DOD) or a DoD entity) attributable to interstate and international calls for the reporting period of January – March 2013 is: **[REDACTED]**.

4. IDT is contributing to the Universal Service Fund based on the reported information, to the extent required by the applicable Commission regulations.

5. IDT has compiled with the applicable reporting requirements described in paragraph (a) of 47 C.F.R. § 64.5001, by providing the required reports to carriers from which transport services were purchased.

The foregoing certification is made under penalty of perjury of the laws of the State of New Jersey on this, the 3rd day of June 2013.

Marcelo Fischer
Chief Financial Officer, IDT Telecom, Inc.

REVIEWED BY LEGAL DEPT.
Date 6/13 Initial CB