



April 8, 2024

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Interoute US, LLC, Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89; Request for Confidentiality

Dear Ms. Dortch:

Pursuant to sections 0.457, 0.459, and 1.50004 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §§ 0.457, 0.459, and 1.50004, EXA Infrastructure US, LLC (formerly known as Interoute US, LLC; hereinafter "EXA" or "the Company") respectfully requests that the Commission withhold from public inspection and grant confidential treatment for the redacted portions of the attachment to this letter, Status Update Report SC-SU0002561. EXA understands that certain information is made available to the public relating to Status Update filings, and requests that this information, and any information from the attached Status Update that may be made available to the public in the future, be kept confidential.

In support of EXA's request for confidential treatment and pursuant to Section 0.459(b) of the Commission's rules, EXA hereby states as follows:

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT.

EXA seeks confidential treatment of the redacted portions of the above-noted Status Update.

2. IDENTIFICATION OF THE COMMISSION PROCEEDING IN WHICH THE INFORMATION WAS SUBMITTED OR A DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION.

EXA is providing confidential commercial information in connection with reimbursement claims under its FCC Form 5640 L.

3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED.

EXA seeks confidential treatment for sensitive commercial information. Public disclosure of this information could result in substantial competitive harm.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION.

The information contained in the attachments for which EXA requests confidentiality relates to equipment currently that has been removed from the network over which it provides telecommunications service.

The services provided by EXA are subject to intense competition from a variety of third-party service providers.

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM.

As noted above, public disclosure of this information could result in competitive harm, as EXA's competitors could leverage the information to their advantage.

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.

EXA has not released the information contained in the Status Update to the public.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES.

The information contained in the Status Update is not available to the public and EXA has not previously disclosed the information to any non-governmental third parties, other than counsel and contractors for purposes of preparing this filing.

8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE.

EXA requests that the material in the Status Update be treated as confidential for five (5) years or as long as the Supply Chain Reimbursement Program continues to make information available to the public, whichever is longer.

9. OTHER INFORMATION THAT EXA US BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED.

EXA believes that the information provided above is sufficient to determine that its request for confidentiality should be granted.

Please do not hesitate to reach out with any questions you have regarding this filing.

Respectfully submitted,

EXA Infrastructure US, LLC

(f/k/a Interoute US, LLC)

/s/

Jocelyn Cho
General Counsel