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June 29, 2026

VIA ICFS

Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

To: Chief, Office of International Affairs

**Re: REQUEST FOR CONFIDENTIAL TREATMENT
Singapore Telecom USA, Inc. Quarterly Part 63.10(c) Reports**

Singapore Telecom USA, Inc. ("Singtel USA") respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ the Commission withhold from public inspection and accord confidential treatment to Singtel USA's enclosed reports, filed pursuant to 47 C.F.R. §§ 63.10(c)(2)-(4) (the "Quarterly Reports").

The Quarterly Reports contain confidential and commercially sensitive information that falls within Exemption 4 of the Freedom of Information Act.² Exemption 4 allows entities to withhold from public information "trade secrets and commercial or financial information obtained from a person and privileged or confidential."³ Section 0.457(d)(2) of the Commission's rules allows persons submitting materials that they wish to be withheld from public inspection in accordance with Section 552(b)(4) to file a request for non-disclosure, pursuant to Section 0.459.⁴ In accordance with the requirements contained in Section 0.459(b) for such requests, Singtel USA states as follows:

1. Identification of the Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1)).

Singtel USA seeks confidential treatment of the following Quarterly Reports filed with the Office of International Affairs:

¹ 47 C.F.R. §§ 0.457, 0.459.

² 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

³ 5 U.S.C. § 552(b)(4).

⁴ 47 C.F.R. § 0.459.

- § 63.10(c)(2) International Traffic and Revenue Report⁵
- § 63.10(c)(3) Quality of Service Report
- § 63.10(c)(4) International Circuit Status Report⁶

2. Identification of the Commission Proceeding In Which the Information Was Submitted or a Description of the Circumstances Giving Rise to the Submission (Section 0.459(b)(2)).

Singtel USA is submitting these Quarterly Reports pursuant to its Part 63.10(c) obligations as a dominant carrier on the Singapore-United States route. Through these Quarterly Reports, Singtel USA provides the Commission with information on its traffic and revenue, the maintenance and quality of its facilities and services, and its active and idle circuits.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3)).

The Quarterly Reports contain commercially sensitive information that could be used by Singtel USA's competitors to its disadvantage. The Reports contain information about the location of Singtel USA's facilities, about customer traffic flowing over those facilities and Singtel USA's associated revenue, and about the quality of service over the Singapore-U.S. route. All of this information is competitively sensitive and could be exploited by Singtel USA's competitors to Singtel USA's disadvantage.

4. Explanation of the Degree to Which the Information Concerns a Service That Is Subject To Competition (Section 0.459(b)(4)).

The Quarterly Reports concern Singtel USA's international private line service. International communications carriage is a competitive industry. In fact, the rules under which Singtel USA files the instant Quarterly Reports are designed to preserve competition in international communications services, and Singtel USA complies fully with those rules in recognition of the importance of maintaining competition among international carriers.

5. Explanation of How Disclosure of the Information Could Result In Substantial Competitive Harm (Section 0.459(b)(5)).

⁵ Please note that the traffic and revenue data for Q1 2026 is not yet available. Accordingly, Singtel USA has provided an estimate for Q1 2026 based on actual data from Q4 2025. In the event the finalized Q1 2026 data materially differs from the proxy data, Singtel USA will file a revised report with the Commission once the data becomes available.

⁶ See 47 C.F.R. §§ 63.10(c)(2)-(4).

Information concerning Singtel USA's facilities, traffic, and revenue is competitively sensitive commercial data and a trade secret, and it constitutes part of Singtel USA's business plans. Singtel USA's competitors could use this information to undermine Singtel USA's current and future business plans and gain an unfair advantage in the marketplace. Consequently, disclosure of this information to third parties could result in substantial competitive harm to Singtel USA.

6. Identification of Any Measures Taken By the Submitting Party to Prevent Unauthorized Disclosure (Section 0.459(b)(6)).

The information contained in the Quarterly Reports is not distributed, circulated, or provided to any party outside of Singtel USA.

7. Identification of Whether the Information Is Available To the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7)).

The information contained in the Quarterly Reports is not available to the public and has not been disclosed to third parties other than the FCC.

8. Justification of the Period During Which The Submitting Party Asserts That Material Should Not Be Available For Public Disclosure (Section 0.459(b)(8)).

Singtel USA maintains that the entire contents of its Quarterly Reports should remain subject to confidential treatment permanently. Singtel USA is required to provide data about its facilities and services each quarter in Part 63.10(c) reports.⁷ Historical data from these Quarterly Reports, if not kept confidential, could be tracked by Singtel USA competitors to reconstruct Singtel USA business plans and extrapolate future strategies. Singtel USA's competitors could potentially gain an unfair advantage in the market even with historical data from Singtel USA's Quarterly Reports.

Please contact the undersigned should you have any questions about this submission.

⁷ *Id.* at §§ 63.10(c)(2)-(4).



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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Svor', with a stylized flourish extending to the right.

Douglas Svor
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
Counsel for Singtel USA