

September 17, 2026

**Via ICFS**

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

**Re:** Request for Confidential Treatment of Section 63.10(c) Dominant Carrier Report for the Second Quarter of 2026

Dear Ms. Dortch:

Pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> BT Americas, Inc. ("BTA") requests confidential treatment of its Section 63.10(c) Dominant Carrier Report for the Second Quarter of 2026 (the "Quarterly Report"). The reasons why this information should not appear for public inspection are discussed below.

**1. Identification of the specific information for which confidential treatment is sought:**

BTA seeks confidential treatment of the data contained in the Quarterly Report.

**2. Identification of the circumstances giving rise to the submission:**

The Quarterly Report must be submitted by international Section 214 holders that are classified as dominant on a U.S.-international route due to an affiliation with a foreign carrier with market power.<sup>2</sup> All data included in this report is required by the Commission's rules. Consistent with the Commission's requirements, the data was further reviewed by the certifying officer.

**3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:**

The proprietary data in this report is sensitive commercial information regarding BTA's communications services, including detailed information on traffic, revenue, active and idle circuits, and the provisioning and maintenance of all basic network facilities and services that BTA procures from its foreign carrier affiliate.

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<sup>1</sup> 47 C.F.R. §§ 0.547, 0.459.

<sup>2</sup> 47 C.F.R. § 63.10(c).

**4. Explanation of the degree to which the information concerns a service that is subject to competition:**

The proprietary data in this report is competitively sensitive commercial information regarding BTA's communications business, and public disclosure could be harmful to the company's competitive position in the market.

**5. Explanation of how disclosure of the information could result in substantial competitive harm:**

Disclosure of the Quarterly Report would reveal information that BTA does not make public and has potential for competitive harm. BTA's competitors and customers could use this information to determine BTA's competitive position and associated revenues. Disclosure would also place BTA at a competitive disadvantage because it will lack the same information regarding its competitors.

**6. Identification of any measures taken to prevent unauthorized disclosure:**

BTA limits access to the information contained in the Quarterly Report to authorized employees only.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:**

BTA has not disclosed the information included in the Quarterly Report to the public or third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure:**

The information described above should not become public until BTA causes it to do so. To the extent that the Commission disagrees and denies this request, BTA requests that it return the enclosed materials to BTA without consideration, consistent with FCC rules.<sup>3</sup>

Please contact me with any questions.

Respectfully submitted,

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<sup>3</sup> See 47 C.F.R. § 0.459(e).