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June 29, 2026

CONFIDENTIAL TREATMENT REQUESTED;
TELXIUS LICENSEES' PROPRIETARY –
NOT FOR PUBLIC DISCLOSURE

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Request for Confidential Treatment of Telxius of First Quarter 2026 Provisioning and Maintenance and International Circuit Capacity Reports Pursuant to 47 C.F.R. §§ 1.767(l)(1) and (2)

Dear Ms. Dortch:

Through counsel, Telxius Cable USA, Inc., Telxius Cable Puerto Rico, Inc., Telxius Cable América, S.A., and Telxius Cable Colombia, S.A. (together, the “Telxius Licensees”) request confidential treatment of data for their consolidated quarterly provisioning and maintenance and international circuit capacity reports pursuant to 47 C.F.R. § 1.767(l)(1) and (2) for the quarter ending March 31, 2026 (the “Confidential Information”), pursuant to 47 C.F.R. §§ 0.457, 0.459, and requests that the Commission withhold these data from any future public inspection. This document contains sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(4).

Exemption 4 of FOIA provides that the public disclosure requirement of the statute “does not apply to matters that are . . . (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential.” 5 U.S.C. § 552(b)(4). Because the Telxius Licensees’ commercial information is “of a kind that would not customarily be released to the public,” this information is “confidential” under Exemption 4 of FOIA. *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

In support of this request and pursuant to 47 C.F.R. § 0.459(b), the Telxius Licensees hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (47 C.F.R. § 0.459(b)(1))

The Telxius Licensees seek confidential treatment with respect to their reports filed pursuant to 47 C.F.R. § 1.767(l)(1) and (2).

2. Description of Circumstances Giving Rise to the Submission (47 C.F.R. § 0.459(b)(2))

The Telxius Licensees are required to disclose the Confidential Information pursuant to 47 C.F.R. § 1.767(l)(1) and (2). The Confidential Information details (1) transactions regarding facilities and services between the Telxius Licensees and their foreign affiliates bearing on the operational status of infrastructure and (2) the amount of active and idle capacity on submarine, satellite, and terrestrial networks held by the Telxius Licensees. This is sensitive commercial information that the Telxius Licensees do not make otherwise publicly available. Public disclosure of these measures could cause competitive commercial harm to the Telxius Licensees.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (47 C.F.R. § 0.459(b)(3))

The information for which the Telxius Licensees seek confidential treatment contains sensitive “trade secrets or privileged or confidential commercial, financial or technical data,” which would customarily be guarded from competitors. 47 C.F.R. § 0.457(d)(2). The Confidential Information is commercial, as it details the nature of the Telxius Licensees’ supply chain, network operating status, level of commercial activity, and (potentially) revenues.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (47 C.F.R. § 0.459(b)(4))

The facilities-based market on the route served by the Telxius Licensees is subject to competition between submarine cable operators.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (47 C.F.R. § 0.459(b)(5))

Disclosure of the Telxius Licensees’ Confidential Information would cause substantial competitive harm. *First*, disclosure would reveal in detail the Telxius Licensees’ supply chain, network operating status, level of commercial activity, and the amount of active and idle capacity on submarine, satellite, and terrestrial networks held by the Telxius Licensees. The Telxius Licensees’ competitors and customers could use this information to determine the Telxius Licensees’ competitive position and associated revenues. *Second*, disclosure of the Telxius

Ms. Marlene H. Dortch
Federal Communications Commission
June 29, 2026
Page 3 of 4

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Licenses' Confidential Information would place the Telxius Licensees at a competitive disadvantage, as the Telxius Licensees lack the same information regarding their competitors.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (47 C.F.R. § 0.459(b)(6))

The Telxius Licensees have never distributed to the public, government officials, competitors, or customers any of the Confidential Information. Some of the circuit capacity information is reported on an annual basis to the Commission, and the Telxius Licensees request confidential treatment for those annual submissions as well. The Telxius Licensees' reports have been drafted and reviewed by a small group of employees and the Telxius Licensees outside regulatory counsel. The Telxius Licensees have checked the appropriate boxes for Item 7 and 12 on the accompanying ICFS form.

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (47 C.F.R. § 0.459(b)(7))

The Telxius Licensees' Confidential Information is and shall remain unavailable to the public. As noted in part 6 above, the Telxius Licensees have not previously disclosed to third parties, other than the undersigned counsel, any of the Confidential Information.

8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (47 C.F.R. § 0.459(b)(8))

The Telxius Licensees request that the Confidential Information not be disclosed for three years from the date of this request. By that time, the sensitivity of the Telxius Licensees' commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge the Telxius Licensees' current market position and revenues.

9. Other Information that the Telxius Licensees Believe May Be Useful in Assessing Whether Their Request for Confidentiality Should Be Granted (47 C.F.R. § 0.459(d)(9))

The Confidential Information is the type of information that would be protected from public disclosure as part of the Commission's circuit status and dominant carrier reporting. The Commission does not otherwise publicly disclose circuit status information by circuit type—much less company-specific data. The Commission should therefore decline to disclose publicly the Telxius Licensees' Confidential Information.

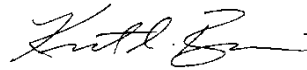
Ms. Marlene H. Dortch
Federal Communications Commission
June 29, 2026
Page 4 of 4

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Should you have any questions concerning this letter, please contact me.

Respectfully submitted,



Kent D. Bressie

*Counsel for Telxius Cable USA, Inc.,
Telxius Cable Puerto Rico, Inc., Telxius
Cable América, S.A., and Telxius Cable
Colombia, S.A.*