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June 29, 2026

CONFIDENTIAL TREATMENT REQUESTED;
BLUESKY-ASHC-SASC 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 AST Telecom, LLC d/b/a Bluesky,
American Samoa Hawaii Cable, LLC, and Samoa American Samoa Cable LLC
for 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, AST Telecom, LLC d/b/a Bluesky, American Samoa Hawaii Cable, LLC, and Samoa American Samoa Cable LLC (collectively, the “Licensees”) request confidential treatment of data for their 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 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 Licensees hereby state as follows:

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

The 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 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 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 Licensees. This is sensitive commercial information that the Licensees do not make otherwise publicly available. Public disclosure of these measures could cause competitive commercial harm to the 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 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 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 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 Confidential Information would cause substantial competitive harm. *First*, disclosure would reveal in detail the 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 Licensees. The Licensees’ competitors and customers could use this information to determine the Licensees’ competitive position and associated revenues. *Second*, disclosure of the Licensees’ Confidential Information would place the Licensees at a

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competitive disadvantage, as the 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 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 Licensees request confidential treatment for those annual submissions as well. The Licensees' reports have been drafted and reviewed by a small group of employees and the Licensees outside regulatory counsel. The Licensees have checked the appropriate boxes for Items 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 Licensees' Confidential Information is and shall remain unavailable to the public. As noted in part 6 above, the 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 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 Licensees' commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge the Licensees' current market position and revenues.

9. Other Information that the 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 Licensees' Confidential Information.

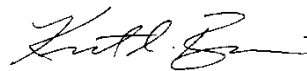
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Should you have any questions concerning this letter, please contact me.

Respectfully submitted,



Kent D. Bressie

Counsel for
AST Telecom, LLC d/b/a Bluesky,
American Samoa Hawaii Cable, LLC, and
Samoa American Samoa Cable LLC