



HWG LLP
1919 M STREET NW
WASHINGTON, DC 20036
TEL: +1 202 730 1300 | HWGLAW.COM

Kent Bressie
direct dial: +1 202 730 1337
kbressie@hwglaw.com

September 13, 2026

CONFIDENTIAL TREATMENT REQUESTED:
CMI 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 China Mobile International Limited of
Second 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, China Mobile International Limited (“CMI”) requests confidential treatment of data for its 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 June 30, 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 CMI’s 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), CMI hereby states as follows:

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

CMI seeks confidential treatment with respect to its 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))

CMI is 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 CMI and its 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 CMI. This is sensitive commercial information that CMI does not make otherwise publicly available. Public disclosure of these measures could cause competitive commercial harm to CMI.

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 CMI seeks 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 CMI’s 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 CMI 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 CMI’s Confidential Information would cause substantial competitive harm. *First*, disclosure would reveal in detail CMI’s 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 CMI. CMI’s competitors and customers could use this information to determine CMI’s competitive position and associated revenues. *Second*, disclosure of the

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CMI's Confidential Information would place CMI at a competitive disadvantage, as CMI lacks the same information regarding its competitors.

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

CMI has 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 CMI requests confidential treatment for those annual submissions as well. CMI's reports have been drafted and reviewed by a small group of employees and CMI outside regulatory counsel. CMI has 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))

CMI's Confidential Information is and shall remain unavailable to the public. As noted in part 6 above, CMI has 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))

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

9. Other Information that CMI Believes May Be Useful in Assessing Whether Its 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 CMI's Confidential Information.

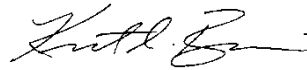
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Should you have any questions concerning this letter, please contact me.

Respectfully submitted,



Kent D. Bressie

*Counsel for China Mobile
International Limited*