

REQUEST FOR CONFIDENTIAL TREATMENT

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September 14, 2026

VIA ICFS

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

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Re: Circuit Status Report of StarHub Ltd., U.S.-Singapore Route, IBFS File No. SCL-LIC-20070824-00015

Dear Ms. Dortch:

Pursuant to Section 0.459(b) of the Commission's rules, 47 C.F.R. § 0.459(b), StarHub Ltd. ("StarHub") hereby requests confidential treatment of the enclosed Circuit Status Report ("Report"), which is being submitted pursuant to Section 1.767(l) of the Commission's rules, 47 C.F.R. § 1.767(l), in connection with IBFS File No. SCL-LIC-20070824-00015. In support of this request, StarHub states as follows:

- (1) **Identification of the specific information for which confidential treatment is sought.** StarHub requests that the Commission withhold from public inspection, and afford confidential treatment to, the Report in its entirety. This is consistent with the Commission's typical practice with respect to such reports.
- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** The Report is being submitted pursuant to Section 1.767(l) of the Commission's rules, 47 C.F.R. § 1.767(l), in connection with IBFS File No. SCL-LIC-20070824-00015.
- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The Report contains detailed information regarding StarHub's operations, which is both commercially and competitively sensitive. Public disclosure of this information could place StarHub at a competitive disadvantage vis-à-vis its competitors, and damage StarHub's position in the marketplace. The Commission has long recognized that competitive harm can result from the disclosure of confidential business information. *See Pan American Satellite Corporation*, FOIA Control Nos. 85-219, 86-38, 86-41 (May 2, 1986).

- (4) **Explanation of the degree to which the information concerns a service that is subject to competition.** The Report concerns StarHub's activities in international communications markets, which are subject to robust competition from numerous existing and potential service providers, as the Commission has acknowledged.
- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.** As noted above, the Report contains detailed information regarding StarHub's operations, which is both commercially and competitively sensitive. StarHub has a commercial interest in all of this information and would be harmed by its disclosure. In particular, the disclosure of this information would provide competitors with unwarranted insights into the operational status of StarHub, and would facilitate the development of strategic and competitively harmful responses by those competitors.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The substance of the Report is not normally distributed, circulated, or provided to any party outside of StarHub that is not bound by confidentiality obligations. StarHub treats this information as sensitive information; thus only certain personnel within the company have access to it.
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** The Report is not available to the public, and has not previously been disclosed to third parties not bound by confidentiality obligations, excepting agents of the Commission.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** StarHub maintains that the Report Material should remain subject to confidential treatment indefinitely. Even historical data can be used to track trends or business decisions, and this information could then be used against StarHub.
- (9) **Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.** StarHub notes that the Report is exempt from disclosure under Exemption 4 to FOIA. 5 U.S.C. § 552(b)(4). Exemption 4 covers "trade secrets and commercial or financial information obtained from a person and privileged or confidential." *Id.* The exemption extends to all information that is: (i) commercial or financial, (ii) obtained from a person, and (iii) privileged or confidential. *See National Parks and Conservation Association vs. Morton*, 498 F.2d 765, 766 (D.C. Cir. 1974). The Confidential Material meets all three of these prongs.

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First, the terms “commercial” and “financial” are “given their ordinary meaning,” and include any information in which a submitter holds a “commercial interest.” *Public Citizen Health Research Group vs. FDA*, 704 F.2d 1280, 1288 (D.C. Cir. 1983). As noted above, the Report contains detailed information regarding StarHub’s operations, which is both commercially and competitively sensitive. StarHub has a commercial interest in all of this information; thus, it is “commercial or financial.”

Second, “obtained by a person” refers to receipt of information from “a wide range of entities, including corporations.” *Landfair v. U.S. Dep’t. of Army*, 645 F.Supp. 325, 327-28 (D.D.C. 1986). StarHub is a corporation and it provided the Commission with the Report; thus, the information at issue here is “obtained by a person.”

Third, information is privileged or confidential if disclosure of it (i) is likely to cause substantial harm to the submitter's competitive position, (ii) would make it difficult for the government to obtain reliable information in the future, or (iii) would impair other governmental interests. *See Judicial Watch, Inc. v. Exp.-Imp. Bank*, 108 F. Supp. 2d 19, 28-29 (D.D.C. 2000). As discussed above, disclosure of the Report would cause substantial harm to StarHub’s competitive position. For this reason, disclosure of the Report also would encourage StarHub and others “to be less forthcoming in their submissions, out of concern both for appearances and their own financial interests.” *Id.* at 29-30.

Please contact the undersigned should you have any questions concerning this filing.

Respectfully submitted,



Elizabeth R. Park

Counsel for StarHub Ltd.