



Public Version

## The CommLaw Group

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November 12, 2009

### Via Email

Email: [records@wutc.wa.gov](mailto:records@wutc.wa.gov)

Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive S.W.  
Olympia, Washington 98504

**Re: *Grasshopper Group, LLC***  
***Registration and Competitive Classification of Telecommunication Companies***

Ladies and Gentlemen:

On behalf of Grasshopper Group, LLC ("Grasshopper"), transmitted herewith are both PUBLIC and CONFIDENTIAL versions of its Registration and Competitive Classification of Telecommunications Companies ("Registration").

Grasshopper respectfully requests confidential treatment of the financial statements submitted in connection with its Registration. Grasshopper respectfully requests the Commission afford perpetual and continuing confidential treatment of certain financial information submitted in connection with Grasshopper's Registration. The financial information for which confidential treatment is requested pertains to Grasshopper's consolidated balance sheet, income statement, and cash flow statement for the first three quarters of 2009 and any and all information derived therefrom, and includes information pertaining to its unregulated services. The information for which Grasshopper seeks confidential treat is specifically included in the definition of confidential information in WAC 480-07-160(2). Each page of the confidential material is marked "CONFIDENTIAL PER WAC 480-07-160" in the Confidential version of its submission. The confidential materials have been redacted from the Public Version of its submission with the first page of the filing marked as "PUBLIC VERSION."

As a privately held company, Grasshopper is not under any obligation to prepare or release public financial statements. The disclosure of Grasshopper's financial information in the context of its registration or otherwise could provide competitors with valuable insight into Grasshopper's financial structure and planned operations. Because this represents highly confidential and strictly proprietary information, the disclosure of which to the public, including competitors, could result in direct and immediate harm to Grasshopper's competitive position, there is a genuine need for Grasshopper to seek non-disclosure of this information.

While the Commission needs to review this information to determine and confirm the merits of the Registration submitted, the general public has no direct or substantive interest in this information. Grasshopper's competitors also do not require this information other than to gain potential competitive advantage or to use the information in an unfair and potentially anti-competitive manner.

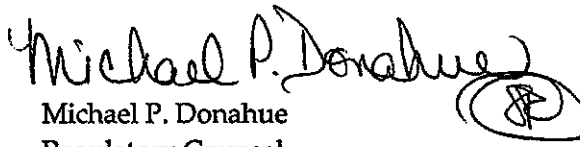
The enduring policies of the state have been to encourage and support competition in telecommunications. Essential to the proper workings of that policy is the maintenance of a level playing field in which competitors are made to compete on their own merits relative to price, service quality, innovation and customer service. Allowing access to one competitor's commercially sensitive information runs contrary to these principles and, hence, would not serve the public interest.

To the Company's knowledge, the information sought to be protected has not been made public in any other forum or jurisdiction. Grasshopper is seeking in other jurisdictions similar protective orders to safeguard the confidentiality of this information.

Accordingly, Grasshopper respectfully requests the Commission afford confidential treatment of the financial information submitted in the Confidential version of its Registration.

Should there be any questions regarding this matter, kindly contact that undersigned.

Respectfully submitted,

  
Michael P. Donahue  
Regulatory Counsel

MPD/sr  
Enclosures



UTILITIES AND TRANSPORTATION  
COMMISSION  
*Celebrating 100 Years*

**REGISTRATION AND COMPETITIVE CLASSIFICATION  
OF TELECOMMUNICATION COMPANIES**

All telecommunications companies must register with the Utilities and Transportation Commission (UTC) prior to beginning operations in the state of Washington. Refer to RCW 80.36, WAC 480-121, 480-80, and 480-120.

1300 South Evergreen Park Drive SW  
PO Box 47250  
Olympia, WA 98504-7250

Telephone 360-664-1160 / Fax 360-586-1150  
TTY 360-586-8203 or 1-800-416-5289  
Website: [www.wutc.wa.gov](http://www.wutc.wa.gov)

The UTC has a policy of providing equal access to its services. To request this document in alternate formats, please call 360-664-1133.

- Complete the application form.
- Submit these forms via the Records Center Web portal or e-mail to [records@wutc.wa.gov](mailto:records@wutc.wa.gov) as an electronic attachment. UTC encourages electronic submission of filings.
- UTC will issue a registration certificate with an effective date 30 days from the date the completed application is received and approved.

**Include the following:**

X Current Balance Sheet                       Latest Annual Report, if any

**Competitive Classification**

X  Applicant is subject to effective competition and requests waiver of regulatory requirements  
Yes No outlined in WAC 480-121-063 (1).

**Telecommunications Company Information**

Company Name: Grasshopper Group, LLC                      d/b/a:  
Company Mailing Address: 197 1st Avenue, Suite 200  
City/State/Zip: Needham, Massachusetts 02494  
Web Site Address: [www.grasshopper.com](http://www.grasshopper.com)

Unified Business Identification Number (UBI): 602955460  
(If you do not know your UBI number or need to request one contact the Department of Licensing at 360-664-1400)

Questions regarding this application should be directed to:

Name: Michael P. Donahue, Esq., Helein & Marashlian, LLC  
Phone Number: (703) 714-1319      Fax Number: (703) 714-1330      Email: [mpd@commlawgroup.com](mailto:mpd@commlawgroup.com)  
Mailing Address: 1420 Spring Hill Road, Suite 205  
City/State/Zip: McLean, Virginia 22102

**Registered Agent** (A Washington Agent is required if the company is located outside Washington State):

Name: Corporate Filing Solutions Llc  
Mailing Address: 3304 Rosedale St., NW, Suite 200  
City/State/Zip: Gig Harbor, Washington 98335  
Phone Number: 1-617-399-6932

**Name, address and title of each officer or director (attach additional pages if needed)**

Name	Address	Title
SEE ATTACHED		

**Regulatory Contact:**

Name: Dominic Schiavone, Vice President of Operations  
Mailing Address: 197 1st Avenue, Suite 200, Needham, Massachusetts 02494  
Phone Number: 800-820-8210 Fax Number: 866-466-1618  
E-mail: dschiavone@grasshopper.com

**Consumer Questions and/or Complaint Contact:**

Name: Dominic Schiavone, Vice President of Operations  
Mailing Address: 197 1st Avenue, Suite 200, Needham, Massachusetts 02494  
Phone Number: 800-820-8210 Fax Number: 866-466-1618  
E-mail: dschiavone@grasshopper.com

**Emergency Contact:**

Name: Dominic Schiavone, Vice President of Operations  
Mailing Address: 197 1st Avenue, Suite 200, Needham, Massachusetts 02494  
Phone Number: 800-820-8210 Fax Number: 866-466-1618  
E-mail: dschiavone@grasshopper.com

**Telecommunication services that will be provided (check all that apply):**

- |  |  |
|--|--|
| <input type="checkbox"/> Local Exchange Service (Resale) | <input type="checkbox"/> Data Services         |
| <input type="checkbox"/> Calling Cards                   | <input type="checkbox"/> Prepaid Calling Cards |
| <input type="checkbox"/> Alternate Operator Services     | <input type="checkbox"/> Directory Assistance  |
| X Long Distance Interlata                                | <input type="checkbox"/> WATS (800/888)        |
| X Long Distance Intralata                                |  |
| <input type="checkbox"/> Other, please specify _____     |  |

## Grasshopper Group, LLC

### Managers/Members

#### Managers:

Siamak Taghaddos, Chief Executive Officer  
197 1st Avenue, Suite 200  
Needham, Massachusetts 02494

David Hauser, Chief Technology Officer  
197 1st Avenue, Suite 200  
Needham, Massachusetts 02494

Dominic Schiavone Vice President of Operations  
197 1st Avenue, Suite 200  
Needham, Massachusetts 02494

#### Members:

Siamak Taghaddos, Chief Executive Officer  
197 1st Avenue, Suite 200  
Needham, Massachusetts 02494

David Hauser, Chief Technology Officer  
197 1st Avenue, Suite 200  
Needham, Massachusetts 02494

Mohammed Taghaddos  
197 1st Avenue, Suite 200  
Needham, Massachusetts 02494

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, **SAM REED**, Secretary of State of the State of Washington and custodian of its seal,  
hereby issue this

**CERTIFICATE OF REGISTRATION**

to

**GRASSHOPPER GROUP, LLC**

a/an MA Limited Liability Company. Charter documents are effective on the date  
indicated below.

Date: 9/28/2009

UBI Number: 602-955-460

APPID: 1545051



Given under my hand and the Seal of the State  
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State