

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

**APPLICATION FOR PROTECTIVE ORDER
AND TRADE SECRET PROTECTION
OF RURAL TELEPHONE COMPANY GROUP**

The Rural Telephone Company Group (the "RTCG") (listed individually on Attachment A hereto) hereby moves the North Dakota Public Service Commission (the "Commission") for an Order under Chapter 69-02-09 and section 69-02-09-4 of the North Dakota Administrative Code granting Trade Secret Protection to certain of the materials filed by the members of the RTCG in compliance with North Dakota Administrative Code section 69-09-05-12(3) and section 69-09-05-12.1 in order to file their annual 2008 ETC reports.

1. Description. The information which each member of the RTCG wishes to have designated as Confidential is contained in a separate envelope for each individual company and is marked "TRADE SECRET – PRIVATE."

In general, the information so designated for each company consists of:

- a. A description of Service Improvement Plans,
 - b. A summary of Universal Service Support in 2007 and the Expenditures of each company,
 - c. A description of improvements and upgrades, and
 - d. An outage report.
2. The information so designated by each company derives independent economic value, actual or potential, from not being generally known to other persons

because the information is maintained as proprietary information and is not shared with the public or competitors except in a more general sense. The level of detail involved would easily allow competitors to determine the level of support and the cost of service to study areas and exchanges in each company's service areas.

3. The information is not readily ascertainable by proper means by other persons because it contains a description of matters which is only reviewed and known by the highest management level personnel and includes descriptions of capital spending plans and improvements in detail not available to those outside the management group.

4. A general description of those persons or entities that could obtain economic value from the disclosure or use of the information are competitor or potential competitors which include wireless providers, cable television providers, competitive local exchange carriers, internet providers, dish networks, and other local exchange carriers.

5. A specific description of the known competitors and competitors' goods and services that are pertinent to this filing are:

- a. Alltel and Verizon: cellular, CMRS, and data plans.
- b. Midcontinent Communications: video, internet, and telecommunications.
- c. Qwest: voice, data, and video services.

In addition to these providers, there is a host of competing technologies and providers on a national scale, such as Vonage and other providers of internet and VOIP services.

6. A description of the efforts used to maintain the secrecy of the information includes assuring that access to the information is restricted to the employees and

management-level persons who have a need to know the information and it is not disclosed to persons outside the company except under strict circumstances.

Dated at Minot, North Dakota, this 31st day of July, 2008.


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ATTACHMENT A

BEK Communications Cooperative
Consolidated Telcom
Dakota Central Telcom I, Inc.
Dakota Central Telecommunications Cooperative
Dickey Rural Access, Inc.
Dickey Rural Telephone Cooperative
Dickey Rural Communications, Inc.
Griggs County Telephone Company
Moore and Liberty Telephone Company
Halstad Telephone Company
HTC Services, Inc.
Inter-Community Telephone Company, LLC
Midstate Communications, Inc.
Midstate Telephone Company
Missouri Valley Communications, Inc.
Nemont Telephone Cooperative, Inc.
Sagebrush Cellular, Inc.
North Dakota Telephone Company
Northwest Communications Cooperative
Polar Communications Mutual Aid Corporation
Polar Telcom, Inc.
Wolverton Telephone Company
Reservation Telephone Cooperative
Turtle Mountain Communications
United Telephone Mutual Aid Corporation
West River Telecommunications Cooperative