

DONALD A. NEGAARD
JAMES E. NOSTDAHL
CAROL K. LARSON
DAVID J. HOGUE
REED A. SODERSTROM
BRENT M. OLSON
DEBRA L. HOFFARTH
SCOTT M. KNUDSVIG
RYAN D. SANDBERG
MATTHEW H. OLSON

ATTORNEYS LICENSED IN
NORTH DAKOTA
MINNESOTA
MONTANA

PH
LAW OFFICES OF
PRINGLE & HERIGSTAD, P.C.
2525 ELK DRIVE
POST OFFICE BOX 1000
MINOT, NORTH DAKOTA 58702-1000
(701) 852-0381
FAX (701) 857-1361
E-mail: pringle@srt.com

OF COUNSEL
HERBERT L. MESCHKE
RETIRED
THOMAS A. WENTZ
JAN M. SEBBY

KENNETH G. PRINGLE
(1914-1983)
MITCHELL H. MAHONEY
(1929-1996)
ROGER O. HERIGSTAD
(1919-2003)
MARK F. PURDY
(1927-2011)

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JUL 29 2011

PUBLIC SERVICE COMMISSION

July 29, 2011

Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-0480

RE: ETC FILINGS

Enclosed for filing on behalf of the companies shown on Attachment A hereto please find an original and seven copies of an Application for Protective Order and Trade Secret Protection of Rural Telephone Company Group. Pursuant to Section 69-02-09-02 of the North Dakota Administrative Code, the trade secret information is being submitted under separate cover for each individual company, in separate sealed envelopes labeled as Trade Secret – Private.

Very truly yours,



David J. Hogue

DJH/klb

Enclosures

2 **PU-11-585** Filed: 7/31/2011 Pages: 5
Application to Protect Trade Secret and Confidential Information

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

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

Each company which is listed individually on Attachment A hereto and collectively referred to as the Rural Telephone Company Group (the "RTCG") hereby moves the North Dakota Public Service Commission (the "Commission") for an Order under Chapter 69-02-09 and section 69-02-09-04 of the North Dakota Administrative Code granting Trade Secret Protection to certain of the materials filed by each individual company 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 2011 Essential Telecommunications Carrier ("ETC") reports.

1. Description. The information which each individual 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 applicant company consists of:

- a) A description of Service Improvement Plans,
- b) A summary of the Expenditures of each company in the prior calendar year,
- c) An estimate of the Universal Service Support to be received in the upcoming calendar year and the planned capital expenditures of each company,

- d) A description of improvements and upgrades, and
- e) An outage report.

2. The information so designated by each applicant 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) AT&T/Alltel, and Verizon: cellular, CMRS, and data plans.
- b) Midcontinent Communications: video, internet, and telecommunications.
- c) Qwest/CenturyLink: 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, Happy Jack, and other providers of internet and voice over the internet providers ("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 29th day of July, 2011.

PRINGLE & HERGISTAD, P.C.



By: David J. Hogue, ND Bar ID #04486
Attorneys for each individual company
listed in attached Exhibit A of the
Rural Telephone Company Group
2525 Elk Drive
P.O. Box 1000
Minot, ND 58702-1000
Telephone (701) 852-0381
Fax (701) 857-1361
dhogue@srt.com

ATTACHMENT A

BEK Communications Cooperative
Consolidated Telcom
Dakota Central Telecommunications Cooperative and Dakota Central Telcom I, Inc.
Dickey Rural Access, Inc.
Dickey Rural Telephone Cooperative
Dickey Rural Communications, Inc.
Griggs County Telephone Company
Moore and Liberty Telephone Company
Halstad Telephone Company
Inter-Community Telephone Company, LLC
Midstate Communications, Inc.
Midstate Telephone Company
Nemont Telephone Cooperative, Inc. - ND./Missouri Valley Communications, Inc.
Sagebrush Cellular, Inc.
North Dakota Telephone Company
Northwest Communications Cooperative
Polar Communications Mutual Aid Corporation – 381630
Polar Communications Mutual Aid Corporation – 381614
Polar Telcom, Inc.
Wolverton Telephone Company
Reservation Telephone Cooperative
United Telephone Mutual Aid Corporation/Turtle Mountain Communications
West River Telecommunications Cooperative