



State Government Relations  
205 North Michigan Avenue  
Suite 700  
Chicago, IL 60601

**TRADE SECRET - PRIVATE**

June 6, 2012

**VIA FEDERAL EXPRESS**  
North Dakota Public Service Commission  
Mr. Darrell Nitschke  
Executive Secretary  
600 East Boulevard, Dept 408  
Bismarck, ND 58505-0480

**RECEIVED**

JUN 06 2012

**PUBLIC SERVICE COMMISSION**

**RE: Verizon Access Transmission Services: Tariff No. 2**

**\*SUPPORTING DOCUMENTATION for Switched Access Rate Reductions to Comply with FCC's USF/ICC Order and Commission's May 3, 2012 Letter; and**

**\*APPLICATION FOR TRADE SECRET PROTECTION**

Dear Mr. Nitschke:

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon Access") hereby files with your office confidential support documentation for its tariff filing in compliance with the FCC's November 18, 2011 USF/ICC Order and the Commission's May 3, 2012 letter relating thereto, which confidential information constitutes trade secret information.

Enclosed is Verizon Access' confidential compliance worksheet – marked "**Trade Secret - Private**" and enclosed in a sealed envelope labeled in same manner – reflecting Verizon Access' calculation of the July 1, 2012 intrastate access rates.

This letter constitutes Verizon Access' application pursuant to North Dakota Administrative Code Ch. 69-02-09 for trade secret protection for its confidential compliance worksheet, as described in detail below. Pursuant to Ch. 69-02-09-02, also enclosed are an original and seven (7) copies of the public portions of this application (including a redacted "public" version of the compliance worksheet).

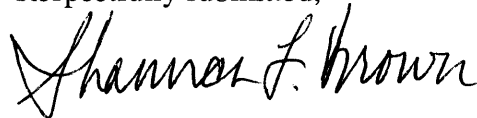
Verizon Access respectfully applies for trade secret protection for the confidential actual intrastate minutes of use volume data set forth in its compliance worksheet, and the calculations based thereon, as this information qualifies as a trade secret under the definition set forth in North Dakota Century Code § 47-25.1-01. Verizon Access goes to great lengths to maintain the confidentiality of this competitively-sensitive information, which is provided only to a limited set of employees with a need for access to perform their job duties. This information is not readily ascertainable through proper means by others because access is limited to a narrow set of Verizon Access employees.

Letter to Mr. Nitschke  
June 6, 2012  
Page Two

Disclosure of Verizon Access' confidential volume data would provide an advantage to competitors – other local exchange carriers operating in North Dakota and providing retail local exchange services to residential and/or business customers within the MCI service territory – because it would reveal information about Verizon Access' market share and competitive success and/or failure in North Dakota. The information would allow competitors to generate strategic business plans targeted to certain local exchange services offered by Verizon Access, in particular areas and to particular classes of customers, and would strengthen the feasibility of competitors' business cases, business plan scenarios, market strategies, tests of key assumptions, and generally guide their going-forward operations with respect to Verizon Access. As such, the compilation of Verizon Access' confidential volume data, and calculations based thereon, derive independent economic value (actual or potential) from not being generally known to, and not being readily ascertainable by proper means by a person able to obtain economic value from its disclosure or use. In contrast, Verizon Access' trade secret information would be of no value to the general public. For all of these reasons, Verizon Access respectfully requests trade secret protection for its confidential compliance worksheet pursuant to North Dakota Administrative Code Ch. 69-02-09 and North Dakota Administrative Code Ch. 69-02-09.

Please date stamp and return the enclosed copy of this letter to my attention in the enclosed self-addressed stamped envelope. If you have any questions, please call me at (312) 260-3245 or send me an email at [shannon.brown@verizon.com](mailto:shannon.brown@verizon.com).

Respectfully submitted,



Shannon L. Brown  
Tariff Manager  
Verizon

Enclosures