

STATE OF NORTH DAKOTA

BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of AT&T Communications)
Of the Midwest, Inc.'s Application for)
Trade Secret Protection)

Case PU-12-262 PUBLIC SERVICE COMMISSION

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APPLICATION FOR TRADE SECRET PROTECTION

AT&T Communications of the Midwest, Inc., ("AT&T") respectfully requests that the Commission enter a trade secret protective order under Section 69-02-09-01 of the North Dakota Administrative Code to provide confidential treatment of the supporting information filed as Attachment A to its Tariff filing in the above captioned proceeding. N.D. Cent. Code Section 47.-25.1-01(4) defines trade secret as "...information...that: (a) Derives independent economic benefit, value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value form its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The information in Attachment A meets this criteria.

1. A general description of the nature of the information sought to be protected.

The financial and rate information requested to be submitted with the filing of the AT&T Access Tariff reflects detailed financial, minutes-of use, demand, revenue, and rate design information related to intrastate switched access service that is not publicly disclosed. This information could have economic value to potential competitors and is highly sensitive.

2. Explanation of why the information derives independent economic value, actual or potential, from not being generally known to other persons.

The information in Attachment A is related to intrastate switched access service and would be of value to competitors as they develop their pricing strategies.

3. Explanation of why the information is not readily ascertainable by proper means by other persons.

This information is not provided to the public because of its competitive value. It is retained within AT&T Midwest and is only available to those employees with a need to know and outside consultants who are subject to a non-disclosure agreement. AT&T security guidelines

and procedures protect the information from disclosure to unauthorized persons inside or outside of the company.

4. General description of the persons or entities that would obtain economic value from disclosure or use of the information.

Competitors and suppliers of telecommunications services would obtain economic value from the information in Attachment A. The minutes-of-use, demand, revenue, and rate design data would assist in the development of pricing strategies and network design.

5. Specific description of known competitors and competitors' goods and services that is pertinent to the information.

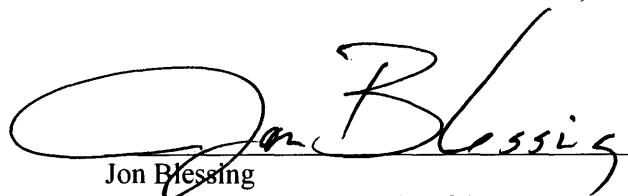
All of the other local exchange carriers filing revised intrastate access filings in July 2012, pursuant to the Federal Communications Commission's Order of November 18, 2011, regarding Inter-carrier Compensation Reform, FCC 11-161, as well as other providers of telecommunications services and equipment would find the information in Attachment A to be of competitive value.

6. Description of the efforts used to maintain the secrecy of the information.

The Information in Attachment A is treated as confidential and proprietary information within AT&T . Only those employees with a need to know and outside consultants who are subject to a non-disclosure agreement have access to this information. With AT&T, the information is noted as confidential and proprietary and its use is governed by AT&T security procedures.

AT&T requests that its Application for Trade Secret protection be granted for the foregoing reasons. Respectfully submitted this 8th day of June, 2012.

AT&T Communications of the Midwest, Inc.



Jon Blessing
Area Manager – External Affairs
2535 E. 40th Avenue, D-3252
Denver, CO 80205