

**Qwest Corporation**  
220 N 5th Street  
Bismarck, North Dakota 58501  
701 222 7051  
701 222 6976 fax

**Kent Blickensderfer**  
State Legislative Affairs Director



May 23, 2014



Mr. Darrell Nitschke  
Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard Avenue, 12<sup>th</sup> Floor  
Bismarck, ND 58505-0480

**Re: In the Matter of Qwest Corporation dba CenturyLink QC's PIDs and PAP Revision  
Case No. PU-13-789**

Dear Mr. Nitschke:

Per the request of Commission staff, enclosed for filing are the Amended Applications Requesting Trade Secret Protection of Confidential Information for the reports filed on March 28 and April 28, 2014, in the above-referenced matter.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent Blickensderfer".

Kent Blickensderfer  
State Legislative Affairs Director

KB/bardm

Enclosures

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of May, 2014, the original and seven copies of the foregoing Amend Applications Requesting Trade Secret Protection of Confidential Information for the reports filed on March 28 and April 28, 2014, were served upon the following party:

Mr. Darrell Nitschke  
Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard Avenue, 12<sup>th</sup> Floor  
Bismarck, ND 58505-0480

and copies sent electronically, addressed to the following:

Kent P. Blickensderfer  
State Legislative Affairs Director  
CenturyLink  
220 North 5<sup>th</sup> Street  
Bismarck, ND 58501



Dianne Barthel  
Dianne Barthel

**STATE OF NORTH DAKOTA  
BEFORE THE PUBLIC SERVICE COMMISSION**

---

**Qwest Corporation PIDs & PAP  
Revision**

**Case No. PU-13-789**

**Amended Application Requesting Trade  
Secret Protection of Confidential  
Information**

---

Qwest Corporation dba CenturyLink QC (“CenturyLink”) requests the North Dakota Public Service Commission, pursuant to Chapter 69-02-09 of the North Dakota Administrative Code, to issue a protective order limiting the disclosure of the North Dakota CLEC-specific payment and performance reports that CenturyLink is submitting in this docket.

The North Dakota CLEC-specific payment and performance reports have been appropriately marked and sealed.

**1. General Description of the Nature of the Information Sought to be Protected.**

**NORTH DAKOTA CLEC-SPECIFIC PAYMENT AND PERFORMANCE REPORTS**

The North Dakota CLEC-specific payment and performance reports contain information pertaining to individual and specific customers of CenturyLink concerning those customers’ businesses.

**2. An Explanation of Why the Information Derives Independent Economic Value, Actual or Potential, From Not Being Generally Known to Other Persons.**

The information for which CenturyLink seeks trade secret protection contains information pertaining to individual and specific customers of CenturyLink concerning those

customers' businesses. CenturyLink is responsible for maintaining the confidentiality of this information. In addition, the disclosure of this information to the public would violate the confidentiality interests of the CLEC customers themselves without their permission.

This information provides independent economic value, actual or potential, is not generally known to, and not readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure.

**3. An Explanation of Why the Information is Not Readily Available by Proper Means to Other Parties.**

The information at issue is proprietary to CenturyLink and is available only to those employees and representatives who have a need to know the information to perform their duties and responsibilities.

**4. The General Description of the Persons or Entities That Would Obtain Economic Value from Disclosure or Use of the Information.**

Competitors or potential competitors of CenturyLink that provide local exchange service and other telecommunications service would obtain economic value from disclosure or use of the information.

**5. Specific Description of Known Competitors or Competitor's Good and Services that are Pertinent to the Information.**

Competitors and potential competitors of CenturyLink in North Dakota include AT&T Communications of the Midwest, Inc., McLeodUSA Telecommunications Services, Inc., MCImetro Access Transmission Services, LLC, Sprint Communications Company L.P., Excel Telecommunications, Inc. and any other provider of telecommunications services in North Dakota or any of the other states in which CenturyLink operates.

**6. A Description of the Efforts Used to Maintain the Secrecy of the Information.**

See No. 3 above.

Dated this 23rd day of May, 2014.

QWEST CORPORATION DBA  
CENTURYLINK QC



---

Kent P. Blickensderfer  
State Legislative Affairs Director  
220 North 5<sup>th</sup> Street  
Bismarck, ND 58501  
(701) 222-7051  
[Kent.blickensderfer@centurylink.com](mailto:Kent.blickensderfer@centurylink.com)