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VIA OVERNIGHT MAIL

October 22, 2013



Mr. Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, Twelfth Floor
Bismarck, ND 58505-0480

**RE: West River Cooperative Telephone Company
FCC Form 481 ETC Annual Report
Case No. PU-13-837**

Dear Mr. Nitschke:

Please find enclosed the original and one (1) copy of Application for Trade Secret Protection pursuant to N.D.A.C. Ch. 69-02-09 for certain trade secret information provided in the West River Cooperative Telephone Company FCC Form 481 Carrier Annual Report filed with the North Dakota Public Service Commission October 14, 2013 in the above-referenced case. A copy of this filing has also been provided by email to ndpsc@nd.gov.

Please contact the undersigned if you have any questions.

Sincerely,

John Kuykendall, Vice President

Authorized Representative for
West River Cooperative Telephone Company

Enclosures

cc: Jerry Reisenauer, West River Cooperative Telephone Company

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
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**STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of)
West River Cooperative Telephone Company)
Request for Confidential Treatment) Case No. PU-13-837
of FCC Form 481 ETC Annual Report)

* * * *

APPLICATION FOR TRADE SECRET PROTECTION

COMES NOW, West River Cooperative Telephone Company (“Company”) and respectfully moves the North Dakota Public Service Commission (“NDPSC”) for entry of a trade secret protective order under § 69-02-09 of the North Dakota Administrative Code. The purpose of the requested protective order is to protect against public disclosure of certain trade secret information provided in the FCC Form 481 Carrier Annual Reporting filed with the North Dakota Public Service Commission October 14, 2013 pursuant to Sections 54.313 and 54.422 of Federal Communications Commission rules.

1. A general description of the nature of the information sought to be protected.
The information for which the Company is seeking confidential treatment is information contained in the U.S. Department of Agriculture Rural Utilities Service (“USDA-RUS”) Operating Report for Telecommunications Borrowers, specifically, all information reported for lines 3013 through 3017 of the FCC Form 481 as contained in the USDA-RUS Operating Report for Telecommunications Borrowers for periods ending December 2011 and December 2012, comprised of balance sheets, income statements, subscriber and system data, investments, depreciation rates and statement of cash flows.

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This information is highly confidential in that it is only maintained by the Company and is not available through any source other than the Company or its authorized agents.

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

The information could have economic value to potential vendors, contractors, and suppliers who may desire to supply components of services being offered by West River. Additionally, competitors may use this information to target certain parts of the various West River service territories where the revenue potential is the greatest. Competitors could use such information against West River's interests in the course of submitting proposals as well as in developing their own business plans.

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

The confidentiality of this information has been maintained by the Company. The information is not disclosed to the public or to persons other than employees or authorized agents of the Company who need to know the information to fulfill their responsibilities in connection with the project or to third persons pursuant to an agreement to maintain the confidentiality of the information.

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

Competitive Local Exchange Carriers, potential equipment and material vendors, contractors, and other suppliers of telecommunications services would obtain economic value from disclosure of the financial and operating information.

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

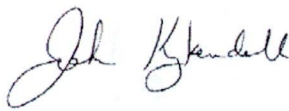
Any other providers of telecommunications services or equipment in North Dakota would obtain economic value from disclosure of the financial and operating information.

6. **A description of the efforts used to maintain the secrecy of the information.**

The confidentiality of the information has been maintained by the Company. The information is not disclosed to the public or to persons other than employees or authorized agents of the Company who need to know the information to fulfill their responsibilities in connection with the project or to third persons pursuant to an agreement to maintain the confidentiality of the information.

Respectfully submitted this 22nd day of October, 2013, in accordance with § 69-02-09 of the North Dakota Administrative Code.

JOHN STAURULAKIS, INC.

By: 

John Kuykendall
Vice President

On behalf of

WEST RIVER COOPERATIVE TELEPHONE COMPANY