



February 7, 2018

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

Re: Application for Protective Order and Trade-Secret Protection of
Citizens Telecommunications Company of Minnesota, LLC

Dear Mr. Nitschke:

In several previous filings with the North Dakota Public Service Commission ("Commission"), Citizens Telecommunications Company of Minnesota, LLC ("CTC-MN"), requested trade-secret treatment of certain material included in those filings. The request for that trade-secret treatment was contained within the body of the filings. For clarity, CTC-MN now submits a separate document to the Commission specifically requesting trade-secret treatment of the material identified in those previous filings.

If you have any questions, please contact me at (952) 491-5534 or via e-mail at scott.bohler@ftr.com.

Respectfully submitted,

A handwritten signature in blue ink that reads "Scott Bohler".

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STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

APPLICATION FOR PROTECTIVE ORDER
AND TRADE-SECRET PROTECTION OF
CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC

Citizens Telecommunications Company of Minnesota, LLC ("CTC-MN") 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 CTC-MN in compliance with North Dakota Administrative Code Section 69-09-05-12(3) and Section 69-09-05-12.1 in connection with the filing of CTC-MN Forms 481 during 2015, 2016, and 2017 as part of the reporting requirements related to Essential Telecommunications Carrier ("ETC") designation.

1. Description. The information which CTC-MN has designated as Confidential is contained in a separate envelope, marked "TRADE SECRET - PRIVATE."

In general, the information so designated consists of:

- Service Outage information – Line 200;
- Unfulfilled Service Requests – Lines 320 and 330;
- Broadband Pricing – Line 710.

2. The information so designated by CTC-MN 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 allow competitors to gain insight into CTC-MN operational practices and service characteristics in the exchanges in CTC-MN's service areas.

The detailed service outage, unfulfilled service request and broadband pricing information is not available in any public sources, and cannot be legally obtained from Frontier without an adequate showing of a legal mandate or need for appropriate use in Frontier's business. The information contained in the FCC Form 481 report lines 200, 320, 330 and 710 contains

information regarding network service outages within Frontier's network, unfulfilled services requests, and broadband pricing by town / exchange and speed that, if disclosed publicly, could compromise the security of the public telecommunications switched network and give unfair benefit and advantage to Frontier's competitors and thereby cause Frontier harm.

While Frontier's broadband price offerings may be publicly available on a targeted and localized basis, Frontier does not make available a statewide description of its pricing across its markets, which is what this report provides. This information is competitively sensitive as pricing is a key component of broadband competition and is not normally released to the public at this scale; release of such sensitive data could give Frontier's competitors an advantage in the markets described therein.

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 at a level of 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:

- AT&T/Alltel and Verizon for cellular, CMRS and data plans; and
- Various other competing technologies and providers on a national scale, such as Vonage, Happy Jack, and other providers of internet and voice-over-the-internet provider ("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 Mound, Minnesota, February 7, 2018.



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