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June 27, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 14-58
2017 ETC Annual Report of Daktel Communications, LLC
Study Area Code 386128
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Daktel Communications, LLC (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is contained in attachments to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Eligible Telecommunications Carriers (“ETCs”) must report outage information which is contained in an attachment to the 2017 ETC Annual Report. In addition, the Rural Broadband Experiments Order requires that recipients file the FCC Form 481 ETC Annual Report to include broadband deployment locations which are contained in the attachment to the Report.⁴
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s outages provided at FCC Form 481 Line 200 attachment, Service

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ *Connect America et al.*, WC Docket Nos. 10-90 and 14-58, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8769, 8778–79, 8787–88, paras. 78-80 (2014) (*Rural Broadband Experiments Order*).

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Outage Reporting, and the entirety of data pertaining to broadband deployment locations provided at FCC Form 481 Line 4004A attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

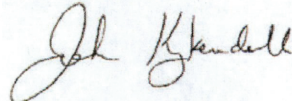
4. With respect to identifying the degree to which the outage and broadband deployment data contained in the Line 200 and Line 4004A attachments concern a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information. The Line 4004A attachment contains competitively sensitive information related to the Company's network deployment.
5. With respect to identifying possible exposure to competitive harm, the outage and broadband deployment information contained in the Lines 200 and 4004A attachments is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the attachments under seal. The Company uses the broadband deployment information to ensure that customers in the areas where it has received rural broadband experiment support will receive state-of-the-art high quality telecommunications and broadband services. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage

information.⁵ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's outage data provided at FCC Form 481 Line 200 attachment and broadband deployment locations provided at FCC Form 481 Line 4004A attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
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⁵ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.