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Andrew Schriener  
State Legislative Affairs Director



February 14, 2020

Mr. Steven Kahl  
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 Nos. PU-19-3 and PU-20-3**

Dear Mr. Kahl:

Enclosed for filing is an Application Requesting Trade Secret Protection of Confidential Information. Consistent with Commission staff directive, the Application will apply to the above-referenced dockets.

Please let me know if you have any questions in this regard.

Sincerely,

A handwritten signature in black ink that reads "Andrew R. Schriener".

Andrew Schriener  
State Legislative Affairs Director

AS/bardm

Enclosures

- 1 PU-20-3 Filed 02/14/2020 Pages: 5  
Application for Protection of Information  
Qwest Corporation
- 34 PU-19-3 Filed 02/14/2020 Pages: 5  
Application for Protection of Information  
Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February, 2020, the Application Requesting Trade Secret Protection of Confidential Information was served upon the following party:

Mr. Steven Kahl  
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:

Andrew Schriener  
State Legislative Affairs Director  
CenturyLink  
200 South 5<sup>th</sup> Street  
Minneapolis, MN 55402

  
Dianne Barthel

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

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<b>In the Matter of Qwest Corporation dba CenturyLink QC's PIDs &amp; PAP Revision</b>	)		<b>Case Nos.    PU-19-3                   PU-20-3</b>
	)		<b>AN APPLICATION REQUESTING TRADE SECRET PROTECTION OF CONFIDENTIAL INFORMATION</b>
	)		

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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 North Dakota CLEC-specific payment and performance reports that CenturyLink has submitted or is submitting in these dockets.

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.     The Specific Law Or Rule On Which Protection Is Based.**

N.D.C.C. 47-25.1-01(4).

**3.a. 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.

**b. 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.

**c. 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.

**d. Specific Description of Known Competitors or Competitor's Goods 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.

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

See No. 3 above.

Dated this 14<sup>th</sup> day of February, 2020.

QWEST CORPORATION DBA  
CENTURYLINK QC



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