

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

In the Matter of 2019 High-Cost Universal Service Support Qwest Corporation Case No. PU-19-073

**APPLICATION TO PROTECT
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 trade secret information included in Exhibit B to CenturyLink’s Annual Report to the North Dakota Public Service Commission Eligible Telecommunications Carrier Certification (“Exhibit B”) that CenturyLink is submitting in this docket.

A copy of Exhibit B has been appropriately marked and sealed.

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

EXHIBIT B TO CENTURYLINK’S ANNUAL REPORT TO THE NORTH DAKOTA PUBLIC SERVICE COMMISSION ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION

Exhibit B contains detailed outage information which is competitively sensitive. All of the confidential information being submitted is viewed as highly proprietary by CenturyLink and is closely guarded to maintain its confidentiality. The outage information submitted by CenturyLink is closely guarded by all carriers offering access services, and if CenturyLink’s confidential information became available to its competitors, they could use such data to target certain areas of CenturyLink’s services and customers to their unfair competitive advantage.

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 confidential and proprietary information regarding detailed outage information, which is competitively sensitive. This information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure. Release of this information to competitors would unfairly enable them to make strategic and tactical decisions that would be harmful to the success and profitability of CenturyLink.

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. CenturyLink also has agreements in place protecting the confidentiality of this information.

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., and Midcontinent Communications 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 26th day of July, 2019.

QWEST CORPORATION DBA
CENTURYLINK QC



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