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June 30, 2020

Hand Delivered

Steven Kahl
Executive Director
ND Public Service Commission
Capitol
600 E. Boulevard, Twelfth Floor
Bismarck, ND 58505

RE: Midcontinent Communications Annual ETC Certification Filing and Submittal
Pursuant to N.D.A.C. §69-09-05-12.1

Dear Mr. Kahl:

In a separate cover letter, Midcontinent's Annual ETC Certification Filing and Submittal Pursuant to N.D.A.C. §69-09-05-12.1 along with Exhibits D and E were provided.

Enclosed with this letter please find separately bound and placed in a sealed envelope labeled "PROTECTED INFORMATION – PRIVATE," one copy of the Confidential Exhibits A, B and C referenced in the document.

Also enclosed please find an Application Requesting trade Secret Protection pursuant to N.D.A.C. Ch. 69-02-09.

Thank you.

Sincerely,

PEARCE DURICK PLLC


ZACHARY E. PELHAM

Counsel to Midcontinent Communications

ZEP/ak
Enclosures

3 PU-20-57 Filed: 6/30/2020 Pages: 4
Application for Protection of Information

Midcontinent Communications

Zachary Pelham, Pearce Durick, PLLC

public disclosure would place the Company at a competitive disadvantage. If disclosed publicly, the information would disadvantage Midcontinent as the information reflects specifics regarding the Company's business activities.

3. An Explanation of Why the Information is Not Readily Available by Proper Means to Other Parties.

The information at issue is propriety to Midcontinent is available only to those employees and representatives of Midcontinent who have a need to know the information to perform their duties and responsibilities. Midcontinent does not disclose this information outside the company except pursuant to the terms of strict agreements or orders to maintain the confidentiality of the information.

4. 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 Midcontinent would obtain economic value from disclosure or use of the information.

5. Specific Description of Known Competitors or Competitor's Goods and Services that are Pertinent to the Information.

Competitors and potential competitors of Midcontinent in North Dakota includes Qwest Corporation, Consolidated Telecom, Dakota Central Telecom I, Missouri Valley Communications, North Dakota Telephone Company, Turtle Mountain Communications, United Telephone Mutual Aid Corporation, AT&T, Sprint Corporation, and any other provider of telecommunications services in North Dakota or any of the other states in which Midcontinent operates.


6. Description of the Efforts Used to Maintain the Secrecy of the Information.

See No. 3 above.

Dated this 30th day of June, 2020.

Respectfully Submitted,

PEARCE DURICK PLLC

BY: 

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*Individually and as Members of the Firm
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