

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

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<b>Public Service Commission vs.</b>	)	
<b>Qwest Corporation Show Cause</b>	)	<b>Case No. PU-20-442</b>
	)	
	)	<b>AN APPLICATION REQUESTING TRADE</b>
	)	<b>SECRET PROTECTION OF CONFIDENTIAL</b>
	)	<b>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 CenturyLink’s Timeline of Communications from August 11, 2021 through September 29, 2021 related to establishing voice service to the Gordon and Sharon Gerbig’s residence, the Miles Gerbig’s residence and the Dorm Henders’ residence (“CenturyLink’s Timeline of Communications”) that CenturyLink has submitted or is submitting in this docket.

CenturyLink’s Timeline of Communications have been appropriately marked and sealed.

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

**CENTURYLINK’S TIMELINE OF COMMUNICATIONS**

CenturyLink’s Timeline of Communications contain personal information related to providing services to the Gordon and Sharon Gerbig’s residence, the Miles Gerbig’s residence and the Dorm Henders’ residence.

**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' services. 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 its customers 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 1st day of October, 2021.

QWEST CORPORATION DBA  
CENTURYLINK QC



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