

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

Public Service Commission vs. Qwest Corporation Show Cause)	Case No. PU-20-442
)	AN AMENDED APPLICATION REQUESTING
)	TRADE SECRET PROTECTION OF
)	CONFIDENTIAL 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 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 has 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) and 47 U.S.C. § 222(c)(1).

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 under 47 U.S.C. § 222(c)(1). 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. Members of the public could potentially obtain economic value from disclosure of the information related to these customers.

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 6th day of October, 2021.

QWEST CORPORATION DBA
CENTURYLINK QC



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