

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 the names of specific customers of CenturyLink, the products they have purchased from CenturyLink and the payment amounts related to the Performance Assurance Plan and Performance Indicator Definitions. 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 30th day of June, 2022.

QWEST CORPORATION DBA
CENTURYLINK QC



Andrew Schriener
State Legislative Affairs Director
200 South 5th Street, Room 2100
Minneapolis, MN 55402
(612) 558-4158
Andrew.schriner@lumen.com