

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Qwest Corporation
PIDs & PAP
Cancellation / Application

Case No. PU-22-20

AFFIDAVIT OF SERVICE BY REGULAR MAIL

STATE OF NORTH DAKOTA
COUNTY OF BURLEIGH

Geralyn R. Schmaltz deposes and says that:

she is over the age of 18 years and not a party to this action and, on the **4th day of January 2023**, she deposited in the United States Mail at Bismarck, North Dakota, **one** envelope by first class mail, fully prepaid, securely sealed each containing a photocopy of:

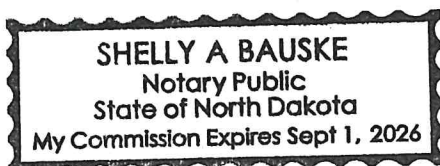
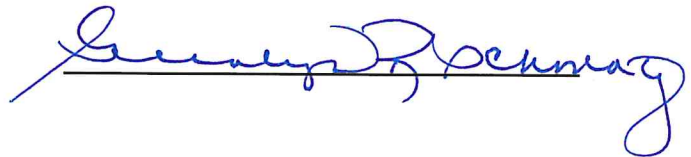
- **Staff Response to Application for Protection of Information**

The envelope was addressed as follows:

Andrew Schriener
State Legislative Affairs Director
CenturyLink
200 South 5th Street
Minneapolis, MN 55402

Each address shown is the respective addressee's last reasonably ascertainable post office address.

Subscribed and sworn to before me
this **4th day of January 2023**.




Notary Public

SEAL

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STAFF RESPONSE TO APPLICATION FOR PROTECTION OF INFORMATION

On June 30, 2022, Qwest Corporation (Qwest) filed an Application for Protection of Information to protect certain information in the captioned case.

The information for which the Company seeks 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.

The Company states that this information is commercial information because it is “information pertaining to individual and specific customers of CenturyLink concerning those customers’ businesses. 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.”

The Company further states that the 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.

Such a result could be harmful for the Company’s customers, now and in the future.

The confidentiality of this information has been maintained by Qwest. The information is not disclosed to the public or to persons other than employees or authorized agents who need to know the information to fulfill their responsibilities in connection with the subject matter of the information.

The persons or entities that would obtain economic value from disclosure or use of the information include AT&T Communications of the Midwest, Inc., McLeod USA Telecommunications Services, Inc., MCImetro Access Transmission Services, LLC, Sprint Communications Company L.P., Excel Telecommunications, Inc., and any other provider of telecommunication services in North Dakota or any other state in which CenturyLink operates. Disclosure of the information sought to be protected would provide these persons and entities prior foreknowledge of information not readily available to the public.

Staff believes that Qwest's application satisfies the requirements of the North Dakota Century Code for protection of the information, which is the subject of this request.

For reasons set forth above, Staff recommends that the Commission grant the application of Qwest to protect certain information filed in the captioned case.

Dated this 3rd day of January 2023.



Brian Johnson
Special Assistant Attorney General Bar ID 07397
North Dakota Public Service Commission
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Bismarck ND, 58505
701-328-2407