

STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION

ASSURANCE WIRELESS USA, L.P.
2026 ETC ANNUAL REPORT

CASE NO. _____

APPLICATION FOR TRADE SECRET PROTECTION

Pursuant to N.D. Admin. Code Ch. 69-02-09, Assurance Wireless USA, L.P. (the “Company”) respectfully requests that the North Dakota Public Service Commission (“Commission”) issue a protective order for the Confidential Exhibits B and C to the Company’s 2026 Eligible Telecommunications Carrier Annual Report (“2026 Annual Report”).

Confidential Exhibit B provides the number of requests for service within the Company’s North Dakota designated service area that were unfulfilled during 2025. Confidential Exhibit C reports the Company’s 2025 complaint rate per 1,000 handsets in its North Dakota designated service area. The Company does not request protection for Confidential Exhibit A through this Application.¹

I. GOVERNING LAW

Except for information protected automatically under N.D. Admin. Code § 69-02-09-13, a person requesting protection of information in an administrative proceeding must file an application that identifies the information, the legal basis for protection, and the facts supporting protection.² The Commission must issue a protective order when it determines that information qualifies for protection.³ North Dakota law provides that trade secret, proprietary, commercial, and financial information is confidential when it is of a privileged nature and has not previously been publicly disclosed.⁴ “Commercial information” includes nonpublic information pertaining to the buying or selling of goods or services when disclosure would cause substantial competitive injury to the person from which the information was obtained.⁵ “Trade secret” includes a compilation or other information that derives actual or potential independent economic value from not being generally known or readily ascertainable by proper means and is subject to reasonable efforts to maintain its secrecy.⁶

¹ Detailed outage information filed by a telecommunications company is protected without an application or further Commission action under N.D. Admin. Code § 69-02-09-13(4).

² N.D. Admin. Code § 69-02-09-01.

³ N.D. Admin. Code § 69-02-09-04.

⁴ N.D.C.C. § 44-04-18.4(1).

⁵ N.D.C.C. § 44-04- 18.4(2)(a).

⁶ N.D.C.C. §§ 44-04- 18.4(2)(d), 47-25.1-01(4).

II. INFORMATION FOR WHICH PROTECTION IS REQUESTED

1. General Description of the Information

The Company requests protection for the information contained in Confidential Exhibit B, which reports unfulfilled requests for service during 2025, and Confidential Exhibit C, which reports complaints per 1,000 handsets during 2025. The information is specific to Assurance Wireless's operations and customers in its North Dakota designated service area and reflects internal service-fulfillment and customer-experience metrics.

2. Explanation of why the Information Derives Independent Economic Value

The data reveal nonpublic information regarding unfulfilled requests for service and customer complaints and derive independent economic value from not being generally known or readily ascertainable, as disclosure would enable competitors to identify T-Mobile's network performance and service vulnerabilities and calibrate competing offerings.

3. Explanation of why the Information Is Not Readily Ascertainable by Proper Means

The information is compiled from internal Company records and systems and is not available from public sources and T-Mobile has taken reasonable means to protect its secrecy.

4. A General Description of the Persons or Entities That Could Obtain Economic Value

Other commercial mobile radio service providers, prepaid wireless providers, wireless resellers, and eligible telecommunications carriers that offer or may offer mobile voice, text, broadband, or Lifeline-supported services in North Dakota could obtain economic value from disclosure.

5. Known Competitors and Relevant Goods and Services

See response to No. 4 above

6. Efforts to Maintain Secrecy

See response to No. 3 above.

In accordance with N.D. Admin. Code § 69-02-09-01(5), the Company is filing a public version of the Annual Report that redacts only the protected information in Confidential Exhibits B and C. The Company is separately submitting one copy of the protected material in a sealed envelope or other appropriate sealed container labeled "**PROTECTED INFORMATION - PRIVATE,**" as required by N.D. Admin. Code § 69-02-09-02(2).

III. CONCLUSION

For the reasons stated above, the Company respectfully requests that the Commission determine that the information identified in Confidential Exhibits B and C qualifies for protection and issue a protective order limiting its disclosure under N.D. Admin. Code § 69- 02-09-04.

/s/ Nicholas Lewis

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