



May 3, 2010

Transmittal No. 206

Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Telephone Utilities Exchange Carrier Association Transmittal No. 206  
Request for Confidential Treatment of Documents

The Telephone Utilities Exchange Carrier Association (TUECA) hereby formally requests confidential treatment of certain cost support data filed in conjunction with Transmittal No. 206 introducing Local Number Portability (LNP) Query Service rates. In this regard, TUECA requests that the information provided under separate cover and marked "TUECA Proprietary" be withheld from public disclosure pursuant to 5 U.S.C. Section 552(b)(4) and Sections 0.457(d) of the Commission's Rules, 47 C.F.R. 0.457(d).

The information for which confidential treatment is requested contains sensitive business information, including TUECA's total investment for equipment used in the provision of LNP Query Service and the breakdown of capital costs (depreciation, cost of money and state and federal taxes), operating expenses (maintenance, administration and ad valorem taxes) and total cost. This information has been maintained on a confidential basis within TUECA and would not ordinarily be disclosed to parties outside the company. Public disclosure of this cost information would reveal the equipment prices TUECA has negotiated with its equipment vendors, thereby permitting competitors to determine TUECA's annual cost factors for all services utilizing central office equipment and providing competitors a clear target for pricing their own services and implementing marketing strategies designed to capture TUECA's access service customers.

As stipulated in Section 0.459(e) of the Commission's Rules, TUECA respectfully requests that the financial information voluntarily submitted herewith be returned if TUECA's request for confidential treatment is denied.

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All correspondence and inquiries in connection with this request should be addressed to me at 801 Pennsylvania Avenue, N.W., Suite 612, Washington D.C., 20004, (202) 393-1516.



John E. Benedict  
Director – Federal Regulatory Affairs  
CenturyLink

Attachments

Duplicate Letter  
Designation of Confidential Information

**DESIGNATION OF CONFIDENTIAL INFORMATION**

I hereby certify that the cost support material designated as "TUECA Proprietary" associated with the attached TUECA Transmittal No. 206 is maintained on a confidential basis within the TUECA and would not ordinarily be disclosed to parties outside the company. Public disclosure of this cost support information could assist competitors, and would thereby harm the competitive position of TUECA.

SIGNATURE:



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John E. Benedict

TITLE: Director, Federal Regulatory Affairs

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