



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

June 17, 2019

THE CONSOLIDATED COMMUNICATIONS COMPANIES
Request for Confidential Treatment of Demand and Revenue Data
In Support of Transmittal No. 92 being filed on a streamlined bases on 15 days' notice under Section
204(a)(3) of the Communications Act.

Consolidated Communications Companies
5 Davis Farm Road
Portland, ME 04103
FRN: 0010155398

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Attention: Wireline Competition Bureau

Dear Ms. Dortch:

Today, the Consolidated Communications Companies ("Consolidated Communications") are filing the 2019 Annual Access Tariff filing for FCC Tariff No. 6 Access Services under Transmittal No. 92, which is being filed on 15 days' notice pursuant to the Commission's "Tariff Streamlining Order".

Because of the competitively sensitive nature, Consolidated Communications has redacted certain projected line data by exchange or study area used in the ARC spreadsheets, intrastate and interstate demand data, and disaggregated interstate and intrastate price outs contained in the FCC forms associated with their 2019 Annual Price Cap Filing. Accordingly, Consolidated Communications is hereby requesting, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R., Section 0.457 and 0.459, pursuant to Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), and pursuant to the Tariff Streamlining Order and rules adopted thereunder, that such projected line data, actual demand data, and disaggregated revenues be treated as confidential.

Under Exemption 4 of the FOIA, commercial or financial information is held to be confidential, and thus entitled to protection, if disclosure of such information would, inter alia, be likely to cause substantial harm to the competitive position of the person from whom the information was obtained. See *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *Critical Mass Energy Project v. NRC*, 830 F.2d 278 (D.C. Cir. 1987).

The information for which Consolidated Communications seeks confidential treatment is competitively sensitive projected line data, actual demand data, and disaggregated revenues which, if made available to competitors and alternate providers, would provide such entities with valuable information regarding Consolidated Communications Companies' customer base in particular areas within a state and demand for specific access service elements.

2019 TRP, Request for Protective Order

June 17, 2019

Page 2

This information, which is otherwise not publicly available, would assist competitors in targeting their marketing efforts to the areas with the largest concentrations of customers and/or to specific services. The data for which Consolidated Communications seek confidential treatment is commercial and financial information, not routinely made available for public inspection. The data relates to demand and revenues in a highly competitive marketplace in which Consolidated Communications Companies are subject to actual and potential competition.

For the reason cited above, Consolidated Communications respectfully requests that the Commission grant confidential treatment to certain detailed projected line data, actual demand data, and disaggregated revenue information submitted in their 2019 Annual Price Cap Filing and that such information be subject to the standard Protective Order issued by the Commission in Public Notice DA in DA 19-509 issued on June 4, 2019 in Docket Number 19-47. Pursuant to the non-disclosure agreement that provides for review of information granted confidential treatment by interested parties, for the specific purpose of review and comment on the instant transmittal only, Consolidated Communications Companies will provide access and review of such information to signatories of such an agreement.

Petitions pertaining to this filing may be served by facsimile to:

Ms. Barbara Galardo, Director Regulatory
Telephone: (207) 535-4126
Email: Barbara.Galardo@consolidated.com

All other correspondence and inquiries concerning this transmittal should be addressed to Sharon Thomas at 407-740-3031 or sthomas@inteserra.com, P.O. Box 200, Winter Park, Florida 32790-0200.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

Enclosures

ST/im