

June 17, 2024

THE CONSOLIDATED COMMUNICATIONS COMPANIES
Request for Confidential Treatment of Demand and Revenue Data
In Support of Transmittal No. 127 being filed on a streamlined bases on 15 days' notice under Section
204(a)(3) of the Communications Act.

Consolidated Communications
2116 S 17th Street
Mattoon, IL 61938
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 2024 Annual Access Tariff filing for FCC Tariffs No. 1, 2, 3, 4, 6, 7, 8 and 9 Access Services under Transmittal No. 127, 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 2024 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.

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 2024 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 22-591 issued on June 1, 2022 in Docket Number 22-108. 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 email to:

Scott Kitchen, Senior Director Regulatory
Telephone: (936) 521-7736
Email: Scott.Kitchen@consolidated.com

Any questions you may have regarding this filing should be directed to my attention at 470-672-3926 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

Enclosures

ST/kb