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Global Crossing

March 20, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A235
Washington, D.C. 20554

**RE: Request for Confidential Treatment of Information Filed Under Seal in Support of
Frontier's Petition for Pricing Flexibility for Special Access and Dedicated
Transport Services**

Dear Ms. Salas:

Frontier Telephone of Rochester, Inc. and Frontier Communications of Seneca-Gorham, Inc. (together "Frontier") hereby request confidential treatment of certain portions of the attached exhibits to Frontier's Petition for Pricing Flexibility for Special Access and Dedicated Transport Services. A Public Version of this Petition and its attachments are being filed today. This request is made pursuant to sections 0.459 and 1.774 of the Commission's Rules, 47 C.F.R. §§ 0.459 and 1.774, and the *Access Charge Fifth Report and Order*, CC Docket No. 96-262, 14 FCC Rcd 14221 (1999) at ¶ 176.

The information sought to be protected is contained in Attachments 2 and 3 to the attached "Confidential Version" of Frontier's Petition, and in additional versions of Exhibit 3, also attached hereto, provided to each of the collocators with respect to each collocator's own facilities. In particular, the information in question consists of:

- (1) the identities of specific service providers and where they have collocated their facilities in Frontier's wire centers; and
- (2) Frontier disaggregated revenue data for special access and dedicated transport services for the competitive wire centers within the MSA and for the MSA in total.

With respect to the collocation data, Frontier submits that the data in question are proprietary to the carriers involved and subject to limitations on use and disclosure under Section 222(b) of the Communications Act, 47 U.S.C. § 222(b). Frontier has complied with the *Access Charge Fifth Report and Order* by providing to each party upon which Frontier relies in its pricing flexibility petition any information contained in the petition about that party's collocation arrangements, even though Frontier is seeking confidential treatment of that information. Therefore, the individual collocators upon which Frontier relies can verify or dispute the accuracy of the collocation information pertaining to them.

With respect to the revenue data, Frontier submits that the revenue data broken down between competitive and less competitive wire centers in the Rochester, New York MSA would provide both actual and potential competitors with valuable market information that would enable them to target their business planning efforts. Disclosure of these data would potentially subject Frontier to significant revenue loss arising from the unfair advantage that such information would provide competitors, by disclosing to them the size of Frontier's market for the services in question and the particular size of the market in the wire centers where there are already competitive transport facilities.

Frontier does not object to making the revenue data available to any party signing a nondisclosure agreement in order to participate in this proceeding. Frontier would not object to a Protective Order such as that adopted in *BellSouth Telecommunications, Inc.'s Petitions for pricing flexibility. See BellSouth Telecommunications, Inc.'s Petition for Pricing Flexibility for Special Access and Dedicated Transport Services, BellSouth Telecommunications, Inc.'s Petition for Pricing Flexibility for Switched Access Services*, CCB/CPD File Nos. 00-20 and 00-21, *Protective Order* (released Aug. 31, 2000). Authorized representatives seeking access to the confidential data should contact:

Gregg C. Sayre, Senior Associate General Counsel - Local Operations
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Very truly yours,



Gregg C. Sayre
Senior Associate General Counsel - Local Operations

GCS:hmj
Attachments