

1. The Cost Support that accompanies HTI's Transmittal No. 13 consists of data both in the aggregate and for specific categories of cost and revenue. Such data is of the type that businesses normally keep confidential and that HTI keeps confidential. The confidential information provided is sensitive commercial data. *See* 5 U.S.C. § 552b(4).
2. The confidential information provides data that is competitively sensitive within the meaning of the Commission's rules, 47 C.F.R. § 0.459(b)(4), specifically, cost and unit calculations and projections.
3. HTI has determined that public disclosure of this information would materially damage HTI's competitive position by providing competitors with information about its financial position. Moreover, the public interest would be impaired by public disclosure of the information contained in the Cost Study, in that any compromise of HTI's competitive or financial position, vis-à-vis its competitors, would ultimately work to the detriment of the consuming public.
4. HTI does not object to limited disclosure of the confidential information so long as a party that wishes to view it, executes a standard Commission approved confidentiality agreement. The Agreement will ensure that the confidential material is only used to assist the party in participating in review of the tariff filing.

WHEREFORE, HTI respectfully requests that the Cost Support submitted with this Transmittal No. 13 be deemed confidential and be indefinitely protected from public inspection.

Respectfully Submitted By:

A handwritten signature in black ink, appearing to read "C.M. Wightman", with a long, sweeping horizontal line extending to the right.

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