

# WEIKLE & Co.

June 8, 2012

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
PO Box 615  
Frankfurt, KY 40602

**RECEIVED** Via Overnight Delivery

JUN 11 2012

PUBLIC SERVICE  
COMMISSION

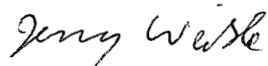
RE: Administrative Case No. 2010-00398 – An Investigation Into The Switched  
Access Rates of Kentucky Incumbent and Competitive Local Exchange Carriers

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case is an original and one (1) copy of a Petition for Confidentiality of Armstrong Telecommunications, Inc. This Petition is to maintain confidentiality for intrastate switched access revenue and demand data being filed in response to a May 30, 2012 Order in the same case. The confidential data supports a tariff filing that has been submitted electronically by Armstrong Telecommunications, Inc. One copy of the confidential data is contained the separate sealed envelope.

If there are any questions, I can be reached at 704.782.7738 or 704.699.9451 (cell).

Sincerely,



Jerry Weikle  
Consultant to Armstrong Telecommunications, Inc.

cc: James D. Mitchell

JERRY L. WEIKLE  
*President*

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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE ) ADMINISTRATIVE CASE  
SWITCHED ACCESS RATES OF ) NO. 2010-00398  
KENTUCKY INCUMBENT AND )  
COMPETITIVE LOCAL EXCHANGE )  
CARRIERS )

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PETITION FOR CONFIDENTIALITY  
OF ARMSTRONG TELECOMMUNICATIONS, INC.

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Comes now, Armstrong Telecommunications, Inc. (“Armstrong”), by and through counsel, and hereby requests that the certain information filed by Armstrong, pursuant to the May 30, 2012 Order of the Kentucky Public Service Commission (the “Commission”) in the above captioned matter, be provided confidential treatment pursuant to KRS 61.870 *et seq.* and Commission Rule 807 KAR 5:001, Section 7, *et seq.* In support of its Petition, Armstrong states as follows:

1. The Commission entered an Order in this docket on May 30, 2012.
2. Pursuant to that Order, Armstrong will be submitting switched access revenue and demand data.

3. By this Petition, Armstrong seeks confidential treatment of certain portions of the information that Armstrong deems to be proprietary and confidential and which should be afforded confidential treatment by the Commission in the filing made today.

4. Pursuant to KRS 61.870, *et seq.*, public agencies within the Commonwealth are required to make available for inspection all public records. However, KRS 61.878 contains certain exceptions to that general requirement, which includes an exception for confidential or proprietary information. To qualify for this exception under KRS 61.878(1)(c), a party must demonstrate that disclosure of its commercial information would permit an unfair commercial advantage to its competitors. The procedure for requesting confidential treatment from the Commission is set forth in Commission Rule 807 KAR 5:001, Section 7.

5. The information provided under seal, contemporaneously with this Petition, includes data that Armstrong believes contains proprietary and commercial information that would permit an unfair advantage to competitors, including competitors who are not involved in this docket. As such, Armstrong requests the Commission to afford confidentiality to this information pursuant to the exception provided in KRS 61.878(1)(c). The data includes confidential access billing units and revenues. This billing and demand information, if disclosed, would provide an unfair commercial advantage to Armstrong's competitors, thereby causing irreparable harm to Armstrong. The disclosure of this information would provide a competitor the opportunity to obtain market and other financial information about Armstrong that is not otherwise available in the public domain. In addition, Armstrong is unable to receive such information about its competitors. In a competitive market, any information learned about a competitor can be used to that competitor's detriment. Unfair competitive advantages hinder

the development of true competition and skew the marketplace, all of which ultimately negatively impacts the consumer.

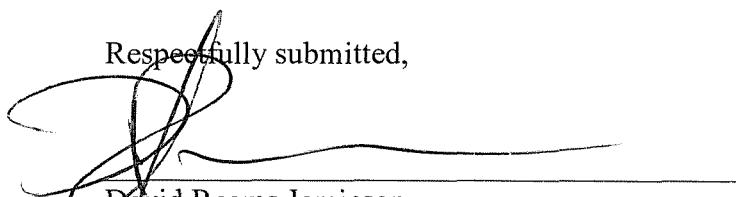
6. Because the information filed today contains data that is not otherwise available to the competitors of Armstrong, disclosure of confidential information of this nature would be detrimental to Armstrong. The information sought to be protected is not known outside Armstrong, nor is it provided to the public. Armstrong controls the dissemination of this information through all reasonable means, and Armstrong's internal use of the information is restricted to only those employees who have a legitimate business reason for reviewing it.

7. If this petition is granted, the public interest will be served because competition will be protected and enhanced. No public purpose is served by the disclosure of such information, and the regulations of the Commission contemplate the filing of such information under Confidentiality Order.

8. The subject of the information for which confidential treatment is sought is clearly identified in the sealed copy of the data filed today.

WHEREFORE, Armstrong Telecommunications, Inc., respectfully requests that the honorable Kentucky Public Service Commission enter an order granting confidential treatment of the information filed today by Armstrong Telecommunications, Inc.

Respectfully submitted,



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David Reams Jamieson  
General Counsel  
(724) 283-0925

Date: June 7, 2012