

Dinsmore & Shohl LLP
ATTORNEYS

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January 11, 2005

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JAN 11 2005
PUBLIC SERVICE
COMMISSION

via Hand Delivery
Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

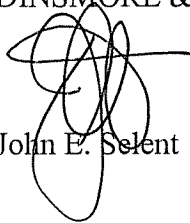
Re: *Bluegrass Wireless LLC's Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky Case No. 2005-00017*

Dear Ms. O'Donnell:

Enclosed for confidential filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to 807 KAR 5:001, Section 7, is one original (containing the confidential information highlighted in orange) and ten (10) redacted copies (not containing the confidential information) of Bluegrass Wireless LLC's Petition for Confidential Treatment of Exhibit C to the Petition for Designation as an Eligible Telecommunications Carrier in the above-styled case.

Very truly yours,

DINSMORE & SHOHL LLP



John E. Selent

JES/HCW/rk

Enclosure

cc: Ron Smith (with enclosure)

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BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

JAN 11 2005

PUBLIC SERVICE
COMMISSION

In the matter of:

BLUEGRASS WIRELESS LLC)
PETITION FOR DESIGNATION AS AN)
ELIGIBLE TELECOMMUNICATIONS CARRIER) Case No. 2005-00017
IN THE COMMONWEALTH OF KENTUCKY)

PETITION FOR CONFIDENTIAL TREATMENT OF EXHIBIT C
TO THE PETITION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

Bluegrass Wireless LLC (“Bluegrass Wireless”), by counsel, pursuant to 807 KAR 5:001, Section 7, hereby petitions the Public Service Commission of the Commonwealth of Kentucky (the “Commission”) for confidential treatment of the attached coverage area map, in its entirety, which is submitted as Exhibit C to Bluegrass Wireless’s petition for designation as an eligible telecommunications carrier. In support of its motion, Bluegrass Wireless states as follows.

1. The coverage area map is exempt from public disclosure pursuant to KRS 61.878 (c) and (d). This statute provides that the following records shall remain confidential unless otherwise ordered by a court of competent jurisdiction:

(c) [R]ecords confidentially disclosed to an agency or required by an agency to be disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records; and

(d) Public records pertaining to a prospective location of a business or industry where no previous public disclosure has been made of the business' or industry's interest in locating in, relocating within or expanding within the Commonwealth.

2. Bluegrass Wireless notes that the cellular telephone market is a competitive industry and that it has active competitors.

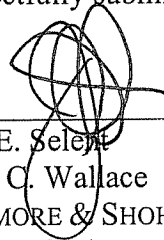
3. The public disclosure of the coverage area map would permit an unfair advantage

to Bluegrass Wireless's competitors.

4. With the information provided in the attached coverage area map, Bluegrass Wireless's competitors could very easily determine the proposed locations of Bluegrass Wireless's cell sites, and more importantly, the scope and strength of Bluegrass Wireless's proposed signal throughout its service area. Ordinarily, a competitor could not obtain this information without investing considerable time and money. This information would give Bluegrass Wireless's competitors a distinct competitive advantage due to the inability of Bluegrass Wireless to likewise determine the scope and strength of its competitors' signals without investing thousands of dollars.

WHEREFORE, pursuant to 807 KAR 5:001, Section 7, Bluegrass Wireless requests the Commission issue an order directing that the attached coverage area map, which is Exhibit C to Bluegrass Wireless's petition for designation as an eligible telecommunications carrier, be afforded confidential treatment pursuant to the rules and regulations of the Commission.

Respectfully submitted,



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Counsel to Bluegrass Wireless

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2. Bluegrass Wireless notes that the cellular telephone market is a competitive industry and that it has active competitors.

3. The public disclosure of the coverage area map would permit an unfair advantage

to Bluegrass Wireless's competitors.

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