

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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Petition of Ballard Rural Telephone Cooperative )  
Corporation, Inc. for Arbitration of Certain Terms )  
and Conditions of Proposed Interconnection )  
Agreement With American Cellular f/k/a ACC )  
Kentucky License LLC, Pursuant to the )  
Communications Act of 1934, as Amended by the )  
Telecommunications Act of 1996 )

Case No. 2006-00215

**RECEIVED**

SEP 29 2006

**PUBLIC SERVICE  
COMMISSION**

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Petition of Duo County Telephone Cooperative )  
Corporation, Inc. for Arbitration of Certain Terms )  
and Conditions of Proposed Interconnection )  
Agreement With Cellco Partnership d/b/a Verizon )  
Wireless, GTE Wireless of the Midwest )  
Incorporated d/b/a Verizon Wireless, and Kentucky )  
RSA No. 1 Partnership d/b/a Verizon Wireless, )  
Pursuant to the Communications Act of 1934, as )  
Amended by the Telecommunications Act of 1996 )

Case No. 2006-00217

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Petition of Logan Telephone Cooperative )  
Corporation, Inc. for Arbitration of Certain Terms )  
and Conditions of Proposed Interconnection )  
Agreement With American Cellular f/k/a ACC )  
Kentucky License LLC, Pursuant to the )  
Communications Act of 1934, as Amended by the )  
Telecommunications Act of 1996 )

Case No. 2006-00218

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Petition of West Kentucky Rural Telephone )  
Cooperative Corporation, Inc. for Arbitration of )  
Certain Terms and Conditions of Proposed )  
Interconnection Agreement With American )  
Cellular f/k/a ACC Kentucky License LLC, )  
Pursuant to the Communications Act of 1934, as )  
Amended by the Telecommunications Act of 1996 )

Case No. 2006-00220

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Petition of North Central Telephone Cooperative Corporation for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With American Cellular f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00252

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Petition of South Central Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00255

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Petition of Brandenburg Telephone Company for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00288

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Petition of Foothills Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00292

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Petition of Gearheart Communications, Inc. d/b/a ) Case No. 2006-00294  
Coalfields Telephone Company for Arbitration of )  
Certain Terms and Conditions of Proposed )  
Interconnection Agreement With Cellco )  
Partnership d/b/a Verizon Wireless, GTE Wireless )  
of the Midwest Incorporated d/b/a Verizon )  
Wireless, and Kentucky RSA No. 1 Partnership )  
d/b/a Verizon Wireless, Pursuant to the )  
Communications Act of 1934, as Amended by the )  
Telecommunications Act of 1996 )

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Petition of Mountain Rural Telephone Cooperative ) Case No. 2006-00296  
Corporation, Inc. for Arbitration of Certain Terms )  
and Conditions of Proposed Interconnection )  
Agreement With Cellco Partnership d/b/a Verizon )  
Wireless, GTE Wireless of the Midwest )  
Incorporated d/b/a Verizon Wireless, and Kentucky )  
RSA No. 1 Partnership d/b/a Verizon Wireless, )  
Pursuant to the Communications Act of 1934, as )  
Amended by the Telecommunications Act of 1996 )

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Petition of Peoples Rural Telephone Cooperative ) Case No. 2006-00298  
Corporation, Inc. for Arbitration of Certain Terms )  
and Conditions of Proposed Interconnection )  
Agreement With Cellco Partnership d/b/a Verizon )  
Wireless, GTE Wireless of the Midwest )  
Incorporated d/b/a Verizon Wireless, and Kentucky )  
RSA No. 1 Partnership d/b/a Verizon Wireless, )  
Pursuant to the Communications Act of 1934, as )  
Amended by the Telecommunications Act of 1996 )

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Petition of Thacker-Grigsby Telephone Company, ) Case No. 2006-00300  
Inc. for Arbitration of Certain Terms and )  
Conditions of Proposed Interconnection Agreement )  
With Cellco Partnership d/b/a Verizon Wireless, )  
GTE Wireless of the Midwest Incorporated d/b/a )  
Verizon Wireless, and Kentucky RSA No. 1 )  
Partnership d/b/a Verizon Wireless, Pursuant to the )  
Communications Act of 1934, as Amended by the )  
Telecommunications Act of 1996 )

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**VERIZON WIRELESS'S THIRD PETITION FOR  
CONFIDENTIAL TREATMENT**

Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated, and Kentucky RSA No. 1 Partnership (“Verizon Wireless”), by its undersigned counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petitions the Kentucky Public Service Commission (“Commission”) for an Order granting confidential treatment to Exhibit JC-1 to the Direct Testimony of John L. Clampitt on behalf of Verizon Wireless and the CMRS Providers (“Clampitt Direct”) filed in the above docket as follows:

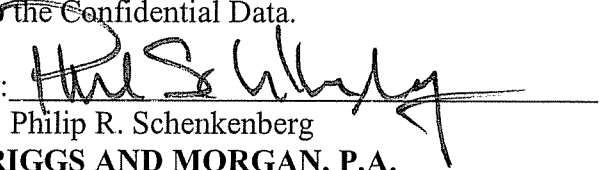
1. As part of Clampitt Direct, Verizon Wireless will provide, certain information regarding mobile-to-land and land-to-mobile minutes of usage (“MOU”s) exchanged between Verizon Wireless and certain rural local exchange carriers in the Commonwealth of Kentucky. The disclosure of such proprietary information would result in irreparable competitive harm to Verizon Wireless by providing its competitors with a non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information, and the Regulations of the Commission contemplate the filing of such information under a Confidentiality Order in proceedings such as this. Additional grounds for this requested relief are stated in the attached affidavit of Elaine Critides which is attached as Exhibit A hereto. The information for which confidential treatment is requested is attached to this filing. Verizon Wireless requests that the information be identified as “Confidential Data” and protected from disclosure by the Commission.

2. Verizon Wireless and each Petitioner have executed a Confidentiality Agreement, and Verizon Wireless has produced the applicable Exhibit JC-1 to each Petitioner subject to that Agreement.

WHEREFORE, Verizon Wireless respectfully requests that the Commission enter all necessary Orders granting confidential treatment to the Confidential Data.

Dated: September ~~20~~, 2006

By:



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(502) 333-6000  
(502) 627-8722 (fax)  
kendrick.riggs@skofirm.com

**ATTORNEYS FOR CELLCO  
PARTNERSHIP D/B/A VERIZON  
WIRELESS, GTE WIRELESS OF THE  
MIDWEST INCORPORATED, AND  
KENTUCKY RSA NO. 1 PARTNERSHIP  
(VERIZON WIRELESS")**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of **VERIZON WIRELESS'S THIRD PETITION FOR CONFIDENTIAL INFORMATION** was on this 29th day of September, 2006 served via electronic and United States mail, postage prepaid to the following:

John E. Selent  
DINSMORE & SHOHL, LLP  
1400 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202

William G. Francis  
FRANCIS, KENDRICK AND FRANCIS  
First Commonwealth Bank Building  
311 North Arnold Avenue, Suite 504  
P.O. Box 268  
Prestonburg, Kentucky 41653-0268

James Dean Liebman  
LIEBMAN & LIEBMAN  
403 West Main Street  
P.O. Box 478  
Frankfort, Kentucky 40602

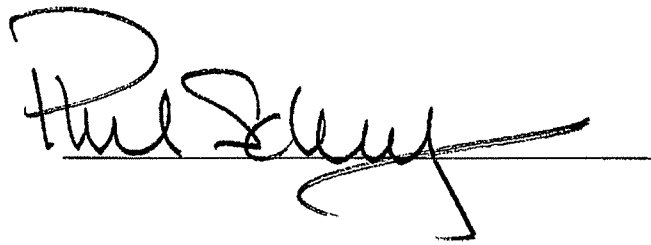
Thomas Sams  
NTCH, INC.  
1600 Ute Avenue, Suite 10  
Grand Junction, Colorado 81501

Bhugin M. Modi  
COMSCAPE COMMUNICATIONS, INC.  
1926 10th Avenue, North  
Suite 305  
West Palm Beach, Florida 33461

NTCH-WEST, INC.  
1970 N. Highland Avenue  
Suite E  
Jackson, Tennessee 38305

The undersigned also hereby certifies that a copy of the unredacted **EXHIBIT JC-1** was on this 29th day of September, 2006 served via electronic and United States mail, postage prepaid to the following:

John E. Selent, Esq.  
Dinsmore & Shohl  
1400 PNC Plaza  
500 West Jefferson Street  
Louisville, KY 40202

A handwritten signature in black ink, appearing to read "John E. Selent", written over a horizontal line.



Petition of North Central Telephone Cooperative Corporation, For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular Corporation f/k/a ACC Kentucky License LLC, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00252

Petition of South Central Rural Telephone Cooperative Corporation, Inc., For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00255

Petition of Foothills Rural Telephone Cooperative Corporation, Inc., For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00292

Petition of Brandenburg Telephone Company For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00288



Petition of Gearheart Communications Inc. d/b/a Coalfields Telephone Company, For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00294

Petition of Mountain Rural Telephone Cooperative Corporation, Inc., For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00296

Petition of Peoples Rural Telephone Cooperative Corporation, Inc., For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00298

Petition of Thacker-Grigsby Telephone Company, Inc., For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00300

**AFFIDAVIT OF ELAINE CRITIDES IN SUPPORT  
OF VERIZON WIRELESS'S PETITION FOR CONFIDENTIAL TREATMENT**

Elaine Critides, being first duly sworn on oath, states as follows:

1. I am a Senior Attorney for Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated, and Kentucky RSA No. 1 Partnership ("Verizon Wireless"), Respondents in the instant proceeding. In my capacity I have personal knowledge of the matters set forth in this affidavit and am authorized to make this affidavit on behalf of Verizon Wireless.

2. Verizon Wireless is requesting confidential treatment for Exhibit JC-1 to the Direct Testimony of John Clampitt on behalf of Verizon Wireless and the CMRS Providers, which includes information regarding mobile-to-land and land-to-mobile minutes of usage ("MOU"s) exchanged between Verizon Wireless and certain rural local exchange carriers. This information has been attached to my affidavit.

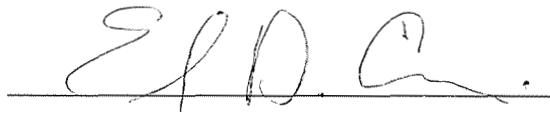
3. Exhibit JC-1 contains proprietary information that would aid competitors of Verizon Wireless, and such trade secret information is subject to protection from disclosure pursuant to Kentucky law. *See* KRS 61.870, et seq.

4. The specific Exhibit Verizon Wireless proposes to file would reveal proprietary information. This information constitutes a trade secret because it is commercial information related to market share and market penetration that, if disclosed, could cause substantial competitive harm to Verizon Wireless. This information is either not publicly available or not generally available in this format. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this format, they could use it to the competitive detriment of Verizon Wireless.

5. Unlike incumbent telephone companies who are typically subject to a high degree of regulation, wireless providers like Verizon Wireless operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

6. This information is not generally disclosed to non-management employees of Verizon Wireless, and is protected internally by Verizon Wireless as proprietary information.

FURTHER YOUR AFFIANT SAYETH NOT.



District of Columbia: ss

Subscribed and sworn to before me  
this 28<sup>th</sup> day of September, 2006.

Linda L. Clowe  
Notary Public

My commission expires: Dec. 14, 2009

**CONFIDENTIAL DATA**

**CONFIDENTIAL DATA**

**EXHIBIT JC-1**

<b>ILEC</b>	<b>M-L MOU</b>	<b>L-M MOU</b>	<b>Traffic Factor</b>
West Kentucky			32.4% - 67.6%
Ballard			35.3% - 64.7%

**PUBLIC INFORMATION**

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