

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

In the Matter of:

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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 Celco )  
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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Case No. 2006-00255

**RECEIVED**

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PUBLIC SERVICE  
COMMISSION

**T-MOBILE'S PETITION FOR  
CONFIDENTIAL TREATMENT**

T-Mobile USA, Inc. Powertel/Memphis, Inc. and T-Mobile Central LLC ("T-Mobile"), 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 1 to T-Mobile's Response to Petitioner's First Information Requests filed in the above dockets as follows:

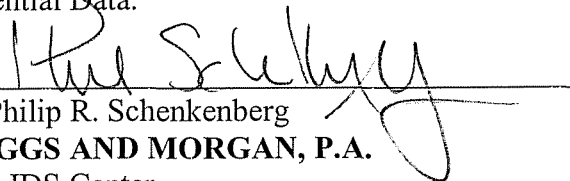
1. Petitioner has requested, and T-Mobile will provide, certain information regarding minutes of usage ("MOU") exchanged between T-Mobile and Petitioner. The disclosure of such proprietary information would result in irreparable competitive harm to T-Mobile by providing its competitors with a non-reciprocal 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 Dan Williams which is attached as Exhibit A hereto. The information for which confidential treatment is requested is attached to

this filing. T-Mobile requests that the information be identified as "Confidential Data" and protected from disclosure by the Commission.

2. T-Mobile and Petitioner have executed a Confidentiality Agreement, and T-Mobile will produce the applicable Exhibit 1 to Petitioner subject to that Agreement.

WHEREFORE, T-Mobile respectfully requests that the Commission enter all necessary Orders granting confidential treatment to the Confidential Data.

Dated: September 7, 2006

By:   
Philip R. Schenkenberg  
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Douglas F. Brent  
**STOLL KEENON OGDEN PLLC**  
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500 West Jefferson Street  
Louisville, Kentucky 40202  
(502) 333-6000  
(502) 627-8722 (fax)  
kendrick.riggs@skofirm.com

**ATTORNEYS FOR T-MOBILE USA, INC.,  
POWERTEL/MEMPHIS, INC. AND T-  
MOBILE CENTRAL LLC**

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of **T-MOBILE'S PETITION FOR CONFIDENTIAL INFORMATION** was on this 1th 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

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

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

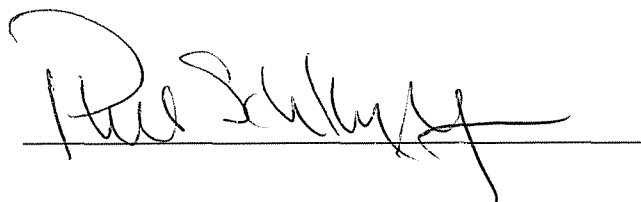
William G. Francis  
FRANCIS, KENDRICK AND FRANCIS  
First Commonwealth Bank Building  
311 North Arnold Avenue, Suite 504  
P.O. Box 268  
Prestonburg, Kentucky 41653-0268

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

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

The undersigned also hereby certifies that a copy of the unredacted **CONFIDENTIAL EXHIBIT 1** was on this 7th 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", is written over a horizontal line.

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

In the Matter of:

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
	)	
	)	
	)	
	)	
	)	
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 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 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 DAN WILLIAMS IN SUPPORT  
OF T-MOBILE'S PETITION FOR CONFIDENTIAL TREATMENT**

STATE OF WASHINGTON            )  
  ) ss.  
COUNTY OF KING    )

Dan Williams, being first duly sworn on oath, states as follows:

1. I am Corporate Counsel for T-Mobile USA, Inc., who with its subsidiaries ("T-Mobile") are the 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 T-Mobile.

2. T-Mobile is requesting confidential treatment for Exhibit 1 to its Response to each Petitioner's First Information Request, which includes information regarding minutes of usage ("MOU") exchanged between T-Mobile and Petitioner. This information has been attached to the affidavit as Exhibit 1.

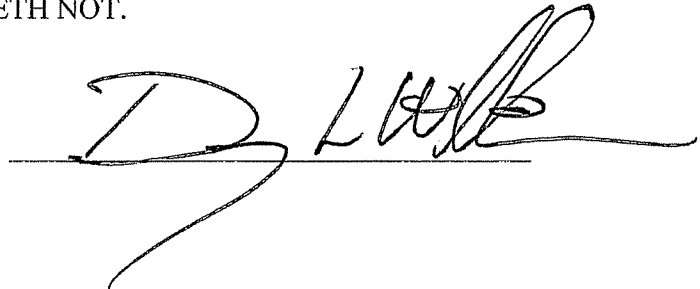
3. Exhibit 1 contains proprietary information that would aid competitors of T-Mobile, and such trade secret information is subject to protection from disclosure pursuant to Kentucky law. *See* KRS 61.870, et seq.

4. The specific Exhibit T-Mobile 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 T-Mobile. 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 T-Mobile.

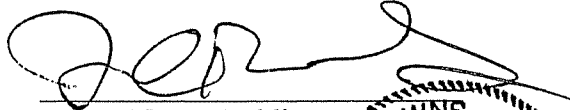
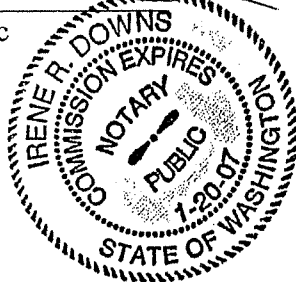
5. Unlike incumbent telephone companies who are typically subject to a high degree of regulation, wireless providers like T-Mobile operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

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

FURTHER YOUR AFFIANT SAYETH NOT.



Subscribed and sworn to before me  
this 6 day of September, 2006.

  
\_\_\_\_\_  
Notary Public



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### EXHIBIT 1 TO T-MOBILE'S RESPONSE TO PETITIONER'S INTERROGATORIES AND DOCUMENT REQUEST (SOUTH CENTRAL)

PETITIONER	TIME PERIOD	INDIRECT M-L MOU*	DIRECT M-L MOU**
South Central	Jul-06		

Legend:

Identifies information that unless deleted would disclose confidential information

\* Mobile to land MOU as determined based on BellSouth or Windstream transit reports

\*\* Mobile to land MOU based on bills issued by Petitioner to T-Mobile, where applicable

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