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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	)	
	)	
Petition of Windstream Kentucky	)	
East, LLC for Arbitration of an	)	
Interconnection Agreement with New	)	
Cingular Wireless PCS, LLC, D/B/A	)	
AT&T Mobility	)	Case No. 2009-00246

**WINDSTREAM KENTUCKY EAST, LLC'S  
PETITION FOR CONFIDENTIAL TREATMENT**

Comes Windstream Kentucky East, LLC ("Windstream East"), by 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 the Complete Copy of Exhibit A (with redactions) attached to Windstream East's Second Amendment to its Supplemental Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility's First and Second Data Requests ("Second Supplemental Responses").

In support of its Petition, Windstream East states as follows:

1. Windstream East previously requested confidential treatment for Exhibits A and B attached to its Second Supplemental Responses on the basis that those exhibits contained proprietary, confidential information that would aid competitors of Windstream East if released, and such confidential and proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. By letter dated January 26, 2010, the Commission granted this request for confidential treatment of Exhibits A and B.

2. Subsequent to Windstream East filing its Second Supplemental Responses and its Petition for Confidential Treatment of Exhibits A and B thereto, Windstream

discovered that it had inadvertently failed to include a Complete Copy of Exhibit A (with redactions). Accordingly, simultaneous with the filing of this Petition for Confidential Treatment, Windstream East is filing a Notice of Filing of Complete Copy of Exhibit A to its Second Supplemental Responses.

3. Windstream East hereby requests confidential treatment for the Complete Copy of Exhibit A (with redactions). This Exhibit contains proprietary, confidential information that would aid competitors of Windstream East if released, and such confidential and proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870 et seq.

4. Providers of the services offered by Windstream East, including wireless, retail and wholesale telephone services and telephone-related services, operate in a highly competitive marketplace where such confidential information is closely guarded to insure it is not disclosed to competitors.

5. This information is not generally disclosed to non-management employees of Windstream and is protected internally by Windstream as confidential and proprietary information.

6. The disclosure of the confidential and proprietary information contained in the Complete Copy of Exhibit A (with redactions) would result in significant or irreparable harm to Windstream East by providing its competitors with 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.

7. Windstream East seeks confidential treatment for the entirety of the Complete Copy of Exhibit A (with redactions) because all of the information contained in the same is highly confidential and proprietary information.

Pursuant to the above referenced statements, Windstream East requests that the Complete Copy of Exhibit A (with redactions) to its Second Amendment to its Supplemental Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility's First and Second Data Requests be deemed confidential by the Commission.

WHEREFORE, Windstream East respectfully requests that the Commission enter all necessary orders granting confidential treatment as requested herein.

Date: 1/28/10

Respectfully Submitted,

By: Robert C. Moore

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 28th day of JANUARY, 2010 on Jeff R. Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615 and by first class mail, postage pre-paid on Mary K. Keyer, General Counsel/AT&T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky 40203, on Paul Walters, Jr., 15 East 1<sup>st</sup> Street, Edmond, Oklahoma 73034.

Robert C. Moore  
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