

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

TDS TELECOM'S PETITION FOR CONFIDENTIAL TREATMENT

Comes now, TDS Telecommunications Corp., on behalf of Leslie County Telephone Company, Lewisport Telephone Company, and Salem Telephone Company (collectively "TDS Telecom" or "TDS Companies"), referred to hereinafter as "Petitioner," by and through counsel and pursuant to 807 KAR 5:001, Section 7, petition the Public Service Commission ("PSC") for an Order granting confidential treatment to portions of the July 8, 2011 Direct Testimony of Bruce Mottern. In support of this Petition, TDS Telecom states as follows:

1. TDS Telecom is requesting confidential treatment for portions of the Direct Testimony of its witness, Bruce Mottern. TDS Telecom seeks an Order determining that such information remains confidential as part of its testimony.

2. Each of the parties to this proceeding have agreed to a single Non-Disclosure Agreement ("NDA"), which limits the disclosure of the protected information. Because of the sensitive nature of significant details of the operations of the parties, each has entered into the NDA to facilitate the exchange of information and to assure its non-disclosure.

3. Portions of TDS Telecom's testimony contain proprietary information that would violate the Parties' NDA, if disclosed.

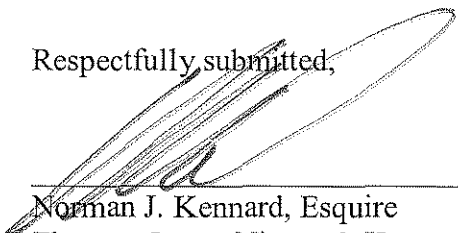
4. The portions of TDS Telecom's testimony for which confidential treatment is sought refer to specific data provided by TDS Telecom, the disclosure of the information could cause substantial competitive harm to those parties.

5. The disclosure of this proprietary information would result in significant or irreparable competitive harm to TDS Telecom. No public purpose is served by the disclosure of such information, and the Regulations of the PSC contemplate the filing of such information under Confidentiality Order.

6. The portions of the testimony for which confidential treatment is sought are clearly identified in the sealed copy of the testimony which was filed July 8, 2011.

For these reasons, TDS Telecom seeks an Order granting confidential protection for portions of the testimony of Bruce Mottern as marked.

Respectfully submitted,



Norman J. Kennard, Esquire
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17101
717-255-7627

James Dean Liebman, Esquire
Liebman and Liebman
403 West Main Street
Frankfort, KY 40601
(502) 226-2000

Bruce Mottern
Manager - State Government Affairs - KY, OH, TN
9737 Cogdill Road, Suite 230
Knoxville, TN 37932
(865) 671-4753

Date: July 14, 2011