

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE STATE)
UNIVERSAL SERVICE FUND)

CASE NO.
2016-00059

VERIZON’S MOTION FOR RECORDS TO BE DEEMED CONFIDENTIAL

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (“Verizon Access”), Cellco Partnership and Cellco Partnership’s commercial mobile radio service provider subsidiaries operating in the state of Kentucky d/b/a Verizon Wireless (collectively, “Verizon”) submit this motion to the Public Service Commission to deem the number of access lines and commensurate amounts of money Verizon has paid into the KUSF as confidential information.

This request is based on the fact that such data will show the amount and share of Verizon’s presence in Kentucky which may be helpful to competitors in determining whether and what business actions to take in Kentucky. Verizon has submitted unredacted information in its original response to the Commission’s First Request for Information to assist the Commission with its decision making. However, Verizon has submitted redacted information to the Commission’s publicly accessible website via the electronic filing center, because providing this unredacted information to competitors is unnecessary to the Commission’s deliberations and creates an unnecessary windfall of information to Verizon’s competitors.

WHEREFORE, Verizon requests that the Commission grant this request, and permit Verizon to submit redacted information regarding access lines and payment amounts to the Commission’s publicly accessible venues, and that the Commission deem Verizon’s unredacted submission as confidential information and seal it from public viewing.

Dated this 27th day of April, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission (which includes a cover letter serving as the required Read First document) within two business days, that the electronic filing was transmitted to the Commission on April 27, 2016, and that there are currently no parties that the Commission has excused from participating by electronic means in this proceeding.

/s/ Luke Morgan