

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

MCI COMMUNICATIONS SERVICES, INC., BELL )  
ATLANTIC COMMUNICATIONS, INC., NYNEX LONG )  
DISTANCE COMPANY, TTI NATIONAL, INC., )  
TELECONNECT LONG DISTANCE SERVICES & )  
SYSTEMS COMPANY AND VERIZON SELECT )  
SERVICES, INC. )

Complainants

CASE NO. 2007-00503

v.

WINDSTREAM KENTUCKY WEST, INC., )  
WINDSTREAM KENTUCKY EAST, INC. – LEXINGTON )  
AND WINDSTREAM KENTUCKY EAST, INC. – LONDON )  
Defendants )

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

Windstream Kentucky West, LLC (“Windstream West”) and Windstream Kentucky East, LLC (“Windstream East”, pursuant to 807 KAR 5:001, Section 7, hereby petition the Kentucky Public Service Commission (“Commission”) for an order granting confidential treatment to their responses to the data requests served by Verizon, AT&T, Sprint, and Commission Staff in this proceeding. In support of their Petition, Windstream East and Windstream West state as follows:

1. Windstream East and Windstream West are requesting confidential treatment for all information and exhibits labeled as confidential in their responses to the various data requests served on them in this proceeding by Verizon, AT&T, Sprint, and Commission Staff ("Confidential Responses"). The Confidential Responses contain proprietary, confidential information that would aid competitors of Windstream East and Windstream West, if released, and otherwise is proprietary and trade secret information not released outside the companies.

Such confidential and proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870 et seq.

2. Windstream East and Windstream West's Confidential Responses in material part contain specific dollar figures or minutes of use information relating to their costs and operations in Kentucky. This information constitutes a trade secret because it is commercial information, that if disclosed, could cause substantial competitive harm to Windstream East and Windstream West. This information is not publicly available. The financial information contained in the Confidential Responses is based on highly confidential and proprietary network and traffic information, and represents highly confidential costs of providing service. It would be difficult, if not impossible, for someone to discover this information from other sources. If this information were available to competitors in this form, they could use it to the competitive disadvantage to Windstream East and Windstream West

3. Windstream West and Windstream East operate in a highly competitive marketplace, including areas served by Verizon, AT&T, and Sprint, where such confidential information is closely guarded to insure it is not disclosed to competitors.

4. This information is not generally disclosed to non-management employees of Windstream West or Windstream East and is protected internally as confidential and proprietary information.

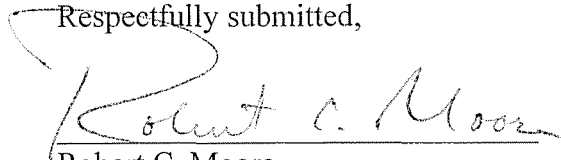
5. The disclosure of the Confidential Responses would result in significant or irreparable harm to Windstream East and Windstream West by providing their competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information, and the regulations of the Commission contemplate the filing of such information under a confidentiality order.

6. Windstream East and Windstream West seek confidential treatment for the entirety of their Confidential Responses because all of the information contained in the same is highly confidential and proprietary financial information.

Pursuant to the above referenced statements, Windstream East and Windstream West request that this information be deemed and treated as confidential by the Commission.

WHEREFORE, Windstream East and Windstream West respectfully request that the **Commission enter all necessary orders granting confidential treatment as requested herein.**

Date: March 5, 2010

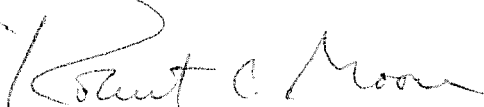
Respectfully submitted,  
  
Robert C. Moore  
HAZELRIGG & COX, LLP  
415 West Main Street, 1<sup>st</sup> Floor  
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(502) 227-2271

And

Kimberly K. Bennett  
Windstream Communications  
4001 Rodney Parham Road  
Little Rock, AR 72212-2442

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon Douglas F. Brent and C. Kent Hatfield, Stoll, Keenon Ogden, PLLC, 2000 PNC Plaza, 500 West Jefferson Street, Louisville, Kentucky 40202, Dulaney L. O’Roark III, Vice President and General Counsel - Southern Region, Verizon, 5055 North Point Parkway, Alpharetta, Georgia 30022, John N. Hughes, 124 West Todd Street, Frankfort, Kentucky, 40601, Mary K. Keyer, General Counsel/AT & T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky, 40203 and Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, by placing same in the U.S. Mail, postage pre-paid, this the 5<sup>th</sup> day of March, 2010.

  
Robert C. Moore