

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

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**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 Windstream East’s Responses 108, 109, 110, 111, 113, 115, 117, 119, 121, 126, 128, 133, 135, 136, 138, 140, 164, 168, 169, 170, 173, 187 and Exhibit B attached to its Responses to AT&T Mobility’s Supplemental Data Requests to Windstream Kentucky East, LLC (“Supplemental Responses”). In support of its Petition, Windstream East states as follows:

1. Windstream East is requesting confidential treatment for the Supplemental Responses 108, 109, 110, 111, 113, 115, 117, 119, 121, 126, 128, 133, 135, 136, 138, 140, 164, 168, 169, 170, 173, 187 and Exhibit B attached to its Supplemental Responses. Those Supplemental Responses and Exhibits contain 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.

3. 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.

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

5. The disclosure of the confidential and proprietary information contained in the Supplemental Responses 108, 109, 110, 111, 113, 115, 117, 119, 121, 126, 128, 133, 135, 136, 138, 140, 164, 168, 169, 170, 173, 187 and Exhibit B 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.

6. Windstream East seeks confidential treatment for the entirety of the Exhibits 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 this information be deemed confidential by the Commission.

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

Respectfully Submitted,

Date: SEPTEMBER 17, 2010

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 17<sup>th</sup> day of SEPTEMBER, 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, and on Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615.

Robert C. Moore  
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