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By Hand Delivery

**REDACTED FOR PUBLIC DISCLOSURE**

February 28, 2019

Marlene H. Dortch, Esq.  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: Cox Communications, Inc. and Its Affiliates  
Annual Customer Proprietary Network Information Certification  
EB Docket No. 06-36  
Request for Confidentiality**

Dear Ms. Dortch:

Cox Communications, Inc., on behalf of itself and its affiliates providing telephone services (collectively, "Cox"), by its attorneys and pursuant to Section 0.459 of the Commission's rules,<sup>1</sup> hereby requests that the Commission afford confidential treatment to the attached customer proprietary network information ("CPNI") certification being filed on behalf of Cox. The confidential version of this request is being filed with the Secretary's office and the redacted version is being filed via the Commission's Electronic Comment Filing System.

Cox requests confidentiality on two grounds. First, public disclosure of the CPNI certification would give data brokers valuable information they could use in their attempts to defeat Cox's security mechanisms and safeguards. Second, much of the information provided in the certification, including information concerning Cox's data security procedures and customer complaints, is proprietary, nonpublic information that is commercially valuable and the public disclosure of which would subject Cox to serious competitive harm. Each of these grounds is sufficient under Section 0.457(d) of the Commission's rules<sup>2</sup> to maintain the confidentiality of the CPNI certification.

For these reasons, Cox requests that the Commission maintain the confidentiality of Cox's CPNI certification.

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<sup>1</sup> 47 C.F.R. § 0.459.

<sup>2</sup> 47 C.F.R. § 0.457(d).



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Please inform me if any questions should arise in connection with this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J.G. Harrington", is written over the typed name.

J.G. Harrington  
Counsel to Cox Communications, Inc.

Attachment [omitted from redacted version]

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