



March 1, 2019

Clover McNeil
(907) 563-3989
clover@astac.net

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Via ECFS

Accepted / Filed

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

MAR - 4 2019

Federal Communications Commission
Office of the Secretary

Re: *Connect America Fund - Alaska Plan*, WC Docket No. 16-271, Required Network Mapping Submission

CONFIDENTIALITY REQUEST

Dear Ms. Dortch:

The attached letter explains that ASTAC Wireless, LLC. ("ASTAC") is submitting confidential network information in an effort to comply as fully as possible with the network mapping requirements of the Alaska Plan. The attached letter itself does not contain confidential information but the attached DVDs do. The Wireline Competition and Wireless Telecommunications Bureaus already determined that the network location information required by the network mapping requirements, which is contained on the DVDs, is likely to be confidential. The Bureaus established an abbreviated means for requesting confidentiality consistent with 47 C.F.R. § 0.459(a)(4).¹ As explained in the attached letter, ASTAC is unable to file the network information in USAC's HUBB and is therefore unable to take advantage of the abbreviated means for requesting confidentiality. Therefore, ASTAC submits this request for confidential treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules. 47 C.F.R. §§ 0.457, 0.459.

¹ See *Connect America Fund - Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068, 2082 (Wireline Comp. & Wireless Telecomm'n's Burs. 2018) ("The location of companies' links and nodes are likely to contain confidential data. Accordingly, this data filing will use an abbreviated means to allow submitters to request confidentiality, consistent with 47 CFR § 0.459(a)(4). Filing material for this data collection will be deemed to be a request under section 0.459 that the material not be made publicly available.").

4300 B Street Suite 501 • Anchorage, AK 99503

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In support of this request, ASTAC hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

ASTAC seeks confidential treatment with respect to the information on the attached DVDs, which reflects the locations of specific elements of ASTAC's communications network, including fiber and microwave links, central offices, wireless towers, certain customer locations, and other network locations (the "Confidential Information").

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

ASTAC is disclosing the Confidential Information pursuant to the network mapping requirements of 47 C.F.R. § 54.316(a)(6) and *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068 (Wireline Comp. & Wireless Telecomm'ns Burs. 2018). ASTAC is unable to submit the information via the HUBB and therefore submits the information on DVD.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The Confidential Information contains sensitive commercial information. It includes highly detailed information regarding ASTAC's network assets, the specific nature and locations of which could provide its competitors with a competitive advantage in planning their networks or market strategies. In addition, the Confidential Information contains information about ASTAC's customers and may contain Customer Proprietary Network Information covered by 47 U.S.C. § 222 and the Commission's implementing rules. Finally, disclosure of the Confidential Information could expose ASTAC's network to malicious actors who could attempt to disrupt communications, including emergency calling and communications provided to first responders and other critical customers.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The depicted facilities are used to provide services that are subject to competition; ASTAC faces competition from other network providers in Alaska.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure would provide ASTAC's competitors with detailed information regarding the locations of its network assets and community anchor institution customers. Competitors could use

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this information to ASTAC's disadvantage by strategically planning their network expansions or customer marketing.

**6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure
(Section 0.459(b)(6))**

The Confidential Information has been kept private and internal to ASTAC and its counsel, authorized agents, and contractors.

**7. Identification of Whether the Information Is Available to the Public and the
Extent of Any Previous Disclosure of the Information to Third Parties (Section
0.459(b)(7))**

ASTAC has not previously disclosed to third parties, other than its counsel and its authorized agents and contractors, any of the Confidential Information.

**8. Justification of Period During Which the Submitting Party Asserts that
Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))**

ASTAC requests that the Confidential Information remain unavailable for public disclosure indefinitely. Network assets are long-lived, and ASTAC cannot forecast a point at which the information would no longer be sensitive.

Please contact me should you have any questions.

Respectfully submitted,



Clover McNeil
Chief Financial Officer
ASTAC Wireless, LLC.
4300 B Street Suite 501
Anchorage, AK 99503

cc: Jesse Jachman
Ying Ke
Jonathan Lechter
Alex Minard
Matthew Warner