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June 28, 2016

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

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)
Docket No. 14-58

Dear Ms. Dortch:

Pursuant to the Protective Order in *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.* (Mar. 22, 2016) and 47 C.F.R. §§ 0.457 and 0.459, Cordova Telephone Cooperative, Inc. ("Cordova"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, Cordova requests confidential treatment of the Five-Year Service Quality Improvement Plan Progress Report (the "Progress Report") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), Cordova states the following:

1. *Identification of the specific information for which confidential treatment is sought.*

Cordova seeks confidential treatment of the Progress Report attached to the Form 481 filing accompanying this letter. The Progress Report contains sensitive financial information about Cordova as well as information about Cordova's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

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The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would "customarily be guarded from competitors"[1] and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).[2]

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Progress Report relates to voice and broadband services provided by Cordova that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

Specifically, the Progress Report sets forth in detail the services provided by Cordova over its existing network including location of customers, as well as planned network improvement and maintenance, including project dates, populations impacted by the improvements and upgrades, and projected capital costs associated with maintaining the network. This information is competitively sensitive information related to the company's existing network and planned upgrades and maintenance, and would benefit Cordova's competitors if they were able to have access to this information.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the Progress Report is likely to result in substantial competitive harm to Cordova because the Progress Report could provide competitors with commercially sensitive insights related to Cordova's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

Cordova does not make the Progress Report or any of the information contained therein publically available in any way. The Progress Report is only made available to key employees with a direct need-to-know basis. This production has been completed by outside counsel.

[1] 47 C.F.R. § 0.457(d)(2).
[2] 5 U.S.C. § 522(b)(4).

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7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

Cordova does not make the Progress Report available to the public and it has not previously allowed disclosure of the Progress Report to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The Progress Report should be treated as confidential for an indefinite period, as Cordova will always be subject to competition and the competitive harms associated with the disclosure of the Progress Report.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.*

None.

In order to provide adequate protection from public disclosure, Cordova requests that the Commission strictly limit distribution of the Progress Report within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the Progress Report, Cordova requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC

Shannon M. Heim
SMHE/ebl

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