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Re: **Request No. 14-58 and 10-90**
481 - Carrier Annual Reporting Data Collection Form
Bookings Municipal Telephone Department (SAC 391650)

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Dear
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Univ nington, DC 2 Administrative Company and be filed w h the appropriate tate
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Ms. Dortch:

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Please contact the undersigned if you have any questions.

Respectfully submitted,
**City of Brookings Municipal
Telephone Department**

/s/ Mary J. Sisak
Mary J. Sisak
Its Attorney

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June 28, 2016

WC Docket No 14-58

WC Docket No 10-90

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: Rule Section 0.459 Request for Confidential Treatment
City of Brookings Municipal Telephone Department (SAC 391650)
FCC Form 481 – Carrier Annual Reporting Data Collection Form**

Dear Ms. Dortch:

City of Brookings Municipal Telephone Department (Brookings or the Company), by its attorney, hereby requests, pursuant to Section 0.459 of the Commission's Rules, that the Company's initial "Five-Year Service Quality Improvement Plan" (Five-Year Plan) filed with the FCC Form 481 and "5 Year Plan Progress Report" (Progress Report), be withheld from public inspection and afforded confidential treatment. Because of the competitively sensitive nature of the information, Brookings seeks to maintain confidentiality for the Five-Year Plan and Progress Report it has submitted to the Commission in connection with its FCC Form 481. The unredacted Form 481 has been marked **CONFIDENTIAL INFORMATION –SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**. A redacted version for public inspection and marked **REDACTED- FOR PUBLIC INSPECTION**, has been submitted via the FCC's electronic filing system.

In accordance with Section 0.459(b) of the Commission's Rules, the Company states:

1. Information for which confidential treatment is sought and proceeding.

The specific information for which confidentiality is sought is the attachment to the Company's Form 481 detailing the Company's Five-Year Plan and its Progress Report for 2015. The Five-Year Plan and the Progress Report provides information concerning annual projected network

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Marlene H. Dortch, Secretary
June 28, 2016
Page 2 of 3

improvements and upgrades for voice and broadband services during the period from 2015 through 2019, projected capital expenditures and operating expenses for voice and broadband services during the same five-year period and information on the progress in network improvements and upgrades during 2015 and 2016.

2. Degree to which the information is commercial or financial or contains a trade secret or is privileged.

The information for which Brookings seeks confidential treatment is competitively sensitive data that Brookings maintains as confidential and does not make available to the public. The information is competitively sensitive projected network improvements and upgrades for voice and broadband services and projected capital expenditures and operating expenses for voice and broadband services for the period 2015 through 2019 and actual data for 2015 which, if made available to competitors and alternative providers, would provide such entities with valuable information regarding Brookings' customer base and plans. This information would assist competitors in targeting their marketing efforts. Brookings is subject to actual and potential competition with respect to all of its services. The Five-Year Plan and Progress Report provide insight into Brookings' strategy and degree of success with specific types of services in its service area. If competitors are able to gain an unfair advantage by obtaining such a detailed picture of Brookings' strategies and successes, they may be able to anticipate Brookings' strategic initiatives in a targeted way. Thus, the filing contains information about the company's business plans that is clearly "commercial" and "financial" in nature. The information is confidential and entitled to protection because the disclosure of the information is likely to cause substantial harm to the competitive position of the person from whom the information is obtained.

3. Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm.

As shown above, the information for which Brookings seeks confidential treatment is competitively sensitive information which, if made available to competitors and alternative providers, would provide those entities with valuable information concerning Brookings' customer base and strategic plan.

4. Measures taken by Brookings to prevent unauthorized disclosure and availability of the information to the public.

As shown above, Brookings maintains the data for which confidential treatment is requested as confidential and does not make it available to the public.

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Marlene H. Dortch, Secretary
June 28, 2016
Page 3 of 3

5. Justification of the period during which Brookings asserts the material should not be available for public disclosure.

Brookings requests that this information be accorded confidential treatment until such time as it is publicly disclosed by Brookings. An indefinite period of confidentiality is required because the information is projected information that provides insight into the Company's confidential strategies and business successes even after the period has expired. For example, the fact that projected projects are not undertaken would also provide valuable competitive information about Brookings' strategies and successes to competitors.

All correspondence and inquiries in connection with this request should be addressed to Brookings' counsel, whose facsimile number is 202-828-5568 and whose email address is mjs@bloostonlaw.com.

Respectfully submitted,
**City of Brookings Municipal
Telephone Department**

/s/Mary J. Sisak
Its Attorney