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| Barbara Galardo 1 Davis Farm Rd Portland, ME 04102 |

**REDACTED – FOR PUBLIC INSPECTION**

Aug 8, 2017

**By Hand**

Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th St., S.W.

Washington, D.C. 20554

RE: *Connect America Fund,* WC Docket No. 10-90*;   
Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42;

*ETC Annual Reports and Certifications*, WC Docket No. 14-58

Dear Ms. Dortch:

On behalf of its affiliated local exchange carriers, (“LECs”), FairPoint Communications Corp. (“FairPoint”) hereby files a revised annual report and certifications required by sections 54.313(a), 54.313(b)(1), 54.313(b)(2), 54.313(c)(4), 54.313(d), 54.313(e)(1), and 54.422 of the Commission’s rules, including rate floor data pursuant to section 54.313(h).[[1]](#footnote-1)

A copy of the report is also being filed with the Universal Service Administrative Company, affected Tribal governments, where applicable, and each relevant State public service commission in which FairPoint operates as an ETC.

Portions of this filing are confidential and are being filed under seal in accordance with the Federal Communications Commission’s *Protective Order* in the above-captioned Docket WC 14-58.[[2]](#footnote-2)

This filing contains confidential, commercially sensitive information on network outages, customer information by exchange, FairPoint’s past, present and future network deployment activities, and FairPoint’s engagements with Tribal governments. FairPoint requests that all of this confidential information, as indicated on the enclosed documents, be withheld from public inspection.

Confidential treatment is appropriate for the detailed reporting of outages, which includes location, cause, duration and efforts taken to prevent further outages, the number of complaints per 1000, and the rate floor loop counts with the associated regulatory fees. This information is competitively sensitive and is not normally released to the public; release of this information could give FairPoint’s competitors an advantage in the markets described herein. Section 4.2 of the Commission’s rules states that reports of service disruptions are “presumed to be confidential.” 47 C.F.R. §4.2.

Confidential treatment also is merited for FairPoint’s unfulfilled voice and broadband service requests. This information is competitively sensitive as it may provide an indication of where FairPoint may target future service expansion. This information is not normally released to the public; release of such sensitive data could give FairPoint’s competitors an advantage in the markets described therein.

In addition, the list of FairPoint’s broadband price offerings is confidential and competitively sensitive. While some broadband price offerings may be publicly available on a targeted and localized basis, FairPoint has not published a companywide description of its pricing across all markets, as contained in this report. Pricing is a key component of broadband competition and is not normally released to the public on this scale. Release of such sensitive data could give FairPoint’s competitors an advantage in the markets contained herein.

Finally, confidential treatment of FairPoint’s Tribal engagements is appropriate. FairPoint has not published the details of its Tribal engagements as this data is customer-specific. Release of such sensitive data could give FairPoint’s competitors an advantage in the markets contained herein.

FairPoint’s Stamped Confidential Documents have been marked, “Protective Order, WC Docket Nos. 14-58, 10-90, 31 FCC Rcd 2089 (WCB 2016).” A single copy of the Stamped Confidential Documents is included for the Wireline Competition Bureau. A redacted copy of the filing today is being submitted via ECFS, marked, “REDACTED – FOR PUBLIC INSPECTION,” as required by the Protective Order.

Please contact me if you have any questions.

Sincerely,

Barbara B. Galardo

Barbara B. Galardo, Director Cost & Access

Enclosures

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| GTC, Inc. (Florala) |
| GTC, Inc. (St Joe) |

1. FairPoint encloses FCC Form 481 for the 2 LECs listed on the last page of this cover letter. [↑](#footnote-ref-1)
2. *Connect America Fund, et al.,* WC Docket Nos. 14-58, 10-90, 31 FCC Rcd 2089 (WCB 2016)(Wireline Competition Bur. & Wireless Telecom. Bur.,rel. March 22, 2016). [↑](#footnote-ref-2)