

Morgan Lewis

Tamar E. Finn

Brett P. Ferenchak

tamar.finn@morganlewis.com

brett.ferenchak@morganlewis.com

August 21, 2017

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

Copy: Wireline Competition Bureau
Jodie May Donovan
Assistant Division Chief, Competition Policy Division
Dennis Johnson
Competition Policy Division

RE: WC Docket No. 17-204

SUPPLEMENT

Joint Application of Crown Castle International Corp., Transferee, LTS Group Holdings LLC, Transferor, and Fiber Technologies Networks, L.L.C., Lighttower Fiber Networks I, LLC, and Lighttower Fiber Networks II, LLC, Licensees for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission's Rules to Transfer Indirect Control of Companies Holding Domestic or International Section 214 Authorizations

Request For Confidential Treatment

Dear Ms. Dortch:

By this letter and pursuant to 5 U.S.C. § 552 and 47 C.F.R. §§ 0.457, 0.459, Crown Castle International Corp., LTS Group Holdings LLC, Fiber Technologies Networks, L.L.C., Lighttower Fiber Networks I, LLC, and Lighttower Fiber Networks II, LLC (collectively, the "Applicants") request that the attached unredacted version of Applicants' Supplement, which is being filed with the Secretary in paper format by hand, be treated as confidential and not subject to public inspection. A redacted version of the Supplement has been filed via ECFS. As described below, Applicants' request satisfies the standards for grant of this request as set forth in Sections 0.457 and 0.459 of the Commission's Rules.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

In accordance with 47 C.F.R. § 0.459(b) and in support of its request, Applicants provide the following information:

(1) Identification of Confidential Materials:

Applicants seek confidential treatment of certain information in the attached Supplement regarding the locations of their fiber network facilities and the extent to which those facilities serve the same locations in certain markets.

(2) Circumstances Giving Rise to Submission of Information:

Applicants are submitting the attached Supplement in response to the Commission's request for additional information in relation to Applicants' Joint Application.

(3) Degree to Which Information is Commercial or Financial:

The information in the Supplement contains confidential and proprietary commercial information of Applicants that is not routinely available for public inspection and is not made publicly available in the ordinary course of business. This information therefore qualifies for protection pursuant to Commission rule and the Administrative Procedure Act. *See* 47 C.F.R. § 0.457(d), which references 5 U.S.C. § 552(b)(4).

(4) Degree to Which the Information Concerns a Service Subject to Competition:

Applicants are competitive telecommunications service providers operating nationwide. The Supplement includes sensitive information regarding the network facilities and business operations of Applicants' telecommunications services.

(5) How Disclosure Could Result in Substantial Harm:

Disclosure of the confidential information contained in the Supplement would cause substantial harm to Applicants' competitive position because it would disclose to competitors the extent to which Applicants have deployed their network facilities in certain markets in which they compete with others for customers.

(6) Measures Taken to Prevent Disclosure:

The Supplement contains sensitive commercial information developed solely for the purposes of submission in this proceeding that would not otherwise be released to third parties.

(7) Public Access to Information, Third Party Disclosure:

Applicants compiled the information specifically to respond to the Commission's request for additional information and have not made this information publicly available through any previous disclosures.

(8) Justification of the Period During Which the Material Should Not be Publicly Available:

Applicants request that the Commission hold this information out of public view for an indefinite period of time. Release of this information may cause substantial harm to Applicants for the reasons set forth herein.

(9) Additional Information:

Due to the competitively sensitive nature of the information contained in the Supplement, Applicants respectfully request that the Commission treat the unredacted Supplement as confidential and withhold the same from public inspection.

Please contact the undersigned should you have any questions concerning the attached documentation, or Applicants' request for confidentiality pursuant to the Commission's rules.

Respectfully submitted,

/s/ Brett P. Ferenchak
Tamar E. Finn
Brett P. Ferenchak
MORGAN, LEWIS & BOCKIUS LLP

Counsel for Transferee

/s/ Yaron Dori
Yaron Dori
Michael Beder
COVINGTON & BURLING LLP

Counsel for Transferor and Licensees