



GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE  
flour mill building  
1000 potomac street nw  
suite 200  
washington, d.c. 20007-3501  
TEL 202 965 7880 FAX 202 965 1729

anchorage, alaska  
beijing, china  
new york, new york  
portland, oregon  
seattle, washington  
GSBLAW.COM

*O*Please reply to ARTHUR H. HARDING  
aharding@gsblaw.com  
Direct Dial (202) 298-2528

September 14, 2016

## REQUEST FOR CONFIDENTIAL TREATMENT

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

Re: MB Docket No. 14-258  
CSR-8895-C

Dear Ms. Dortch:

Pursuant to Section 0.459 of the Commission's rules, Optical Telecommunications, Inc. and HControl Corporation (collectively "OpticalTel"), by their attorneys, hereby request confidential treatment for certain materials being hand delivered today, under seal, to Lynne Montgomery of the Media Bureau.

Today, OpticalTel has filed a "Petition for Reconsideration" of the Bureau Order in the above-referenced proceeding, DA 16-928, released on August 15, 2016. As Exhibit 5 to its Petition for Reconsideration, OpticalTel submitted redacted copy of page 3 of the Neighborhood Value Program Amendment from its 2005 Agreement for Sail Harbour which shows the rate charged by DISH for the package of local broadcast signals on a non-transport basis. The unredacted version of that document has been previously provided under a request for confidentiality as Exhibit 1 to its response dated October 15, 2015 to the October 5, 2015 email from Lynne Montgomery.

In addition, Exhibit 5 to OpticalTel's Petition for Reconsideration includes redacted versions of invoices from DISH to demonstrate that DISH has consistently billed OpticalTel for the local broadcast signals retransmitted by DISH to viewers at Sail Harbour at the sub-distribution (non-transport) rate as set forth in the 2005 Agreement executed by both parties. Confidential treatment is requested for the dollar amounts reflected on these documents because they reflect competitively sensitive, confidential financial information not routinely available to the public, the release of which would result in competitive harm to OpticalTel.<sup>1</sup>

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<sup>1</sup> OpticalTel's Petition for Reconsideration also includes redacted portions of other documents submitted previously in this proceeding, and as to which confidential treatment has already been requested.



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Pursuant to Section 0.459(e) of the Commission's rules, OpticalTel requests that the unredacted invoices be returned without consideration if this request for confidentiality is denied, and that they be either destroyed or returned by the Media Bureau at the conclusion of this proceeding.

Please let me know if there are any questions regarding this request.

Respectfully submitted,

GARVEY SCHUBERT BARER

By

Arthur H. Harding  
Counsel for Optical Telecommunications, Inc. and  
HControl Corporation

cc: Lynne Montgomery  
Steven Broeckaert  
Wayne Johnsen, Esq.