

Exhibit I

Public

July 2, 2018

Via Email

Ms. Elizabeth Drogula
Deputy Division Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GCI Rural Health Care Support for Funding Year 2017

Dear Ms. Drogula,

Pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. §§ 0.457, 0.459, GCI Communication Corp. ("GCI") hereby requests confidential treatment of all materials that it submits in the attachments herein. The attachments contain materials responding to the request of the Telecommunications Access Policy Division ("the Division") for GCI Communication Corp. ("GCI") to modify its cost study regarding satellite transport services provided to eligible rural health care providers ("HCPs") under the Rural Health Care ("RHC") Telecom Program.

The attachments herein include: (1) a modified satellite rate of return bandwidth allocation cost study; and (2) a modified satellite rate of return bandwidth allocation cost study. GCI requests confidential treatment of all materials submitted herein, as well as the withholding of the designated information from any future public inspection.

In support of this request, GCI hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

GCI seeks confidential treatment with respect to the content of this filing, which includes the attachments described above (the "Confidential Information").

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

GCI received information requests from the RHC Telecom Program regarding certain 2017 funding requests of the HCPs for which GCI is a service provider. GCI provided confidential responses to the information requests in November and December 2017 and again on March 30,

2018.¹ Subsequently, GCI met with USAC and FCC staff to discuss the submissions, and the Division has requested that GCI respond to certain proposals and requests regarding the RHC Telecom Program review.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information for which GCI seeks confidential treatment contains sensitive “trade secrets or privileged or confidential commercial, financial or technical data,” which would customarily be guarded from competitors. This is sensitive commercial information that GCI does not otherwise make publicly available. As explained below, public disclosure of these measures could cause competitive commercial harm to GCI. In addition, the mere fact that GCI is being asked to respond may cause competitive harm. Therefore, the information in GCI’s response constitutes sensitive commercial information “which would customarily be guarded from competitors.”

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The submitted information contains information regarding GCI’s Alaska-based telecommunications services. The Alaskan wireline, wireless, and broadband market (including Ethernet) is subject to competition. In particular, the FCC recently found in the Business Data Services proceeding that the market for Ethernet services is highly competitive.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure of GCI’s Confidential Information would cause substantial competitive harm. *First*, disclosure would reveal information regarding GCI’s services, including performance characteristics and pricing, and HCP and E-rate customer information. GCI’s competitors and customers could use this information to determine GCI’s competitive position and associated revenues and thereby gain a competitive advantage. *Second*, disclosure of GCI’s Confidential Information would place GCI at a competitive disadvantage, as GCI lacks the same information regarding its competitors. *Third*, disclosure of this information could harm the competitive bidding process in the RHC program.

¹ See, e.g., Letter from Jennifer P. Bagg, Counsel, GCI Commc’n Corp., to RHC Review, Rural Health Care Program, Universal Serv. Admin. Co. (filed Mar. 30, 2018) (“March 30 Letter”).

Confidentiality Request
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**6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure
(Section 0.459(b)(6))**

GCI does not distribute the Confidential Information to the public, government officials, competitors, or customers. Each page of the documentation containing any of the Confidential Information is clearly marked in bold-face type "GCI Proprietary – Not for Public Disclosure."

**7. Identification of Whether the Information Is Available to the Public and the
Extent of Any Previous Disclosure of the Information to Third Parties
(Section 0.459(b)(7))**

GCI's Confidential Information is and shall remain unavailable to the public. As noted in Part 6 above, GCI has not previously disclosed to third parties, other than the undersigned counsel, any of the Confidential Information.

**8. Justification of Period During Which the Submitting Party Asserts that
Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))**

GCI requests that the Confidential Information not be disclosed for 10 years from the date of this request. By that time, the sensitivity of GCI's commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge GCI's current market position and revenues.

* * * *

Should you have further questions or require additional information in order to grant the requested confidentiality treatment, please contact me immediately so that I can provide further assistance to resolve this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Bagg".

Jennifer P. Bagg
Counsel to GCI Communication Corp.

Enclosures

cc: Trent Harkrader
Preston Wise

Satellite ROR Bandwidth Allocation Redacted in Entirety

Satellite ROR Revenue Allocation Redacted in Entirety