Your business is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED FOR PUBLIC INSPECTION

January 6, 2015

Via ECFS

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

Re: WC Docket No. 10-90, WC Docket No. 14-259
Additional Information for Rural Broadband Experiments
Lennon Telephone Company

Dear Ms. Dortch:

On behalf of Lennon Telephone Company ("Lennon" or the "Company"), JSI files the attached redacted version of the Company's financial and technical information to remain under consideration for Rural Broadband Experiment funding.[1] The confidential version is also being filed on this date via hand delivery. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the attached financial statements and network technology description and diagram.[2]

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Ian Forbes, Telecommunications Access Policy Division

Attachments

[1] *See* Wireline Competition Bureau Announces Deadline for Bidders Interested in Remaining Under Consideration for Rural Broadband Experiments Support to File Additional Information, WC Docket Nos. 10-90 and 14-259, Public Notice (rel. Dec. 18, 2014).
[2] 47 C.F.R. §§ 0.457, 0.459

Your business is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED FOR PUBLIC INSPECTION

January 6, 2015

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

Re: WC Docket No. 10-90, WC Docket No. 14-259
Additional Information for Rural Broadband Experiments
Lennon Telephone Company
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of Lennon Telephone Company ("Lennon" or the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,[1] withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).[2]

1. The information for which the Company is seeking confidential treatment includes both (a) a description and network diagram of the technology and system design that would be used to deliver voice and broadband services to census blocks selected in the Company's Rural Broadband Experiment bids ("Exhibit A"); and (b) the Company's most recent three consecutive years of audited financial statements, including balance sheets, net income, and cash flow ("Exhibit B").[3]

2. Lennon participated in the Rural Broadband Experiments and submitted three bid forms on November 6, 2014. On December 18 the Commission released a Public Notice[4] and an Order[5] wherein it permits Rural Broadband Experiment participants who were not selected as provisional winners but want to remain under consideration to submit technical and financial information by January 6, 2015. Lennon wants to remain in consideration for all of the projects that it submitted on November 6 that were not selected as provisional winners.

---

[1] 47 C.F.R. §§ 0.457, 0.459.
[2] 47 C.F.R. § 0.459(b)(1) through (9).
[3] *See Wireline Competition Bureau Announces Deadline for Bidders Interested in Remaining Under Consideration for Rural Broadband Experiments Support to File Additional Information*, WC Docket Nos. 10-90 and 14-259, Public Notice DA 14-1839 (rel. Dec. 18, 2014).
[4] *Id.*
[5] *See Connect America Fund, et. al.*, Docket Nos. 10-90, 14-58, and 14-192, Report and Order FCC 14-190 (rel. Dec. 18, 2014).

3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of Exhibit A and Exhibit B. Information of this financial and technical nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The telecommunications industry is highly competitive and service providers aggressively market their products and services. Lennon provides service in a geographically limited market and is particularly vulnerable to competition. Any release of financial and proposed network plans would be easily attributed to the Company, and access to and possession of the information for which protection is sought would give the Company's competitors a distinct competitive advantage in marketing in the Company's geographic area.

   Exhibit A contains competitively sensitive information related to proposed deployment plans for the Company's network. Specifically, this information sets forth services to be provided by the Company over its existing network and proposed network expansions including specific locations of customers and the equipment and electronics that the Company intends to utilize. As such, this information contains competitively sensitive information related to the Company's existing and proposed network.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Exhibit A and Exhibit B attachments is information that is not customarily released to the public. This information is proprietary to the Company and is only known to the Company and its authorized agents. If the information is not protected, it would have economic value to potential competitors. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers and technology strategy which would place the Company at a competitive disadvantage.

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers, employees and authorized agents with a direct need to know are authorized to access the financial and technical information contained in Exhibit A and Exhibit B.

7. Any previous versions of this information are not publicly available.

8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.

9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's request to remain under consideration for the Rural Broadband Experiments, and the required information submitted herein.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

Lennon Telephone Company

Exhibit A

Technology Description and Network Design

REDACTED IN ENTIRETY

Lennon Telephone Company

Exhibit B

Financial Statements 2011-2013

REDACTED IN ENTIRETY