



August 2, 2010

**VIA ELECTRONIC FILING**

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

**Re: Notice of *Ex Parte*** In the Matter of Connect America Fund A National Broadband Plan for Our Future WC Docket No. 10-90, GN Docket No. 09-51, and WC Docket No. 05-337

Dear Ms. Dortch:

On July 30, 2010, Ken Pfister of Great Plains Communications, Inc., Blair, Nebraska, Cheryl Parrino of Parrino Strategic Consulting Group, and Mr. Peter Bluhm of Rolka, Loube, Saltzer Associates met with Ms. Sharon Gillett, Ms. Carol Matthey, Ms. Amy Bender, Ms. Rebekah Goodheart, Ms. Katie King, Ms. Elise Kohn, Mr. Al Lewis, Mr. Alex Minard, Ms. Jenny Prime and Mr. Steven Rosenberg to discuss Great Plains operations, financial data, and access minutes.

Great Plains voluntarily provided copies of operational and financial information to staff in this meeting. A request for confidential treatment of certain of this information is provided herewith, and a copy of this letter is being filed in the public record, together with: (i) a copy of the request for confidential treatment and (ii) the redacted version of the highly confidential information.

Sincerely,

Ken Pfister  
Vice President-Strategic Policy

Enclosure

Cc: Ms. Sharon Gillett  
Ms. Carol Matthey  
Ms. Amy Bender  
Ms. Rebekah Goodheart  
Ms. Katie King  
Ms. Elise Kohn  
Mr. Al Lewis  
Mr. Alex Minard  
Ms. Jenny Prime  
Mr. Steven Rosenberg



**REQUEST FOR CONFIDENTIAL TREATMENT  
PURSUANT TO 47 C.F.R. §§ 0.457 AND 0.459**

August 2, 2010

**VIA HAND DELIVERY**

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

**Re:** *Request for Confidential Treatment of Information Submitted* In the Matter of Connect America Fund A National Broadband Plan for Our Future WC Docket No. 10-90, GN Docket No. 09-51, and WC Docket No. 05-337

Dear Ms. Dortch:

Great Plains Communications, Inc. (GPC) hereby requests confidential treatment for data and information it has submitted voluntarily to the Federal Communications Commission ("Commission") in the above-referenced dockets regarding historical financial information. GPC makes this request pursuant to Exemption 4 of the Freedom of Information Act ("FOIA") and the Commission's rules.<sup>1</sup> The GPC information contains company-specific, highly confidential and proprietary commercial information protected from disclosure by FOIA Exemption 4 and the Commission's rules protecting information that is not routinely available for public inspection and that would customarily be guarded from competitors.<sup>2</sup> As described below, GPC's request to maintain the strict confidentiality of this information satisfies the standards set forth in Section 0.457 and 0.459 of the Commission's rules.

In accordance with Section 0.459(b), GPC provides the following information:

(1) *Identification of Confidential Materials:* GPC seeks confidential treatment of certain information and data that was delivered voluntarily to Commission staff copied hereupon in a July 30, 2010 *ex parte* meeting and included in an accompanying August 2, 2010 *ex parte* notice with respect to that meeting. These materials provide sensitive information regarding the actual operations, revenues and costs for GPC and information about the GPC network that is not

<sup>1</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. §§ 0.457(d) and 0.459; *see also* 18 U.S.C. § 1905 (prohibiting disclosure "to any extent not authorized by law" of "information [that] concerns or relates to the trade secrets, processes, operations, style of work, or apparatus, or to the identity, confidential statistical data, amount or source of any income, profits, losses, or expenditures of any person, firm, partnership, corporation, or association").

<sup>2</sup> 47 C.F.R. §§ 0.457(d), 0.457(d)(2), and 0.459.

publicly available. The relevant confidential materials have been marked as such and filed under seal.

(2) Circumstances Giving Rise to Submission of Information: The information is being provided in connection with an *ex parte* discussion with Commission staff where the staff indicated that it would be helpful to understand the finances of a small rural telecommunications carrier. The materials for which confidential treatment is sought are being provided to assist the Commission as it evaluates universal service reform and implementation of the National Broadband Plan in the above-referenced dockets. If this information were disclosed, it would impair the Commission's ability to obtain similar information in the future from GPC and other parties, and it would hinder the Commission's ability to evaluate and implement effective reform.

(3) Degree to Which Information is Commercial or Financial: As noted above, the materials being provided by GPC consist entirely of proprietary data with respect to GPC's actual operations, revenues and costs. GPC is not a publicly traded company and as such this information is not available to the public or government agencies and is guarded in the ordinary course of business from competitors and any other third party. To our knowledge and belief, no company-specific data such as this has ever been made available to the public.

(4) Degree to Which the Information Concerns a Service Subject to Competition: The materials provided contain detailed information on GPC's operations, revenues, and costs. GPC faces competition in parts of its service areas from wireless operators, Internet access operators, and other entities, and the disclosure of such information to those existing competitors and/or others contemplating competitive operations is likely to produce competitive harm.

(5) How Disclosure Could Result in Substantial Harm: Disclosure could cause substantial competitive harm because GPC's competitors could assess aspects of GPC's operations, finances, and business plans and strategies, and could use that information to undermine GPC's business plan. Providing other parties (including but not limited to existing or potential competitors) with insight into GPC's operations and its financial status would cause substantial harm as the data and information could be used to undermine GPC's competitive position.

(6), (7) Measures Taken to Prevent Disclosure; Public Access to Information, Third Party Disclosure: GPC routinely treats this information as highly confidential and proprietary and guards against its release to others. Access to this information is provided only to those who require it for the specific purpose of conducting business on behalf of GPC.

(8) Justification of the Period During Which Materials Should Not be Publicly Available: GPC requests that the information be treated as confidential indefinitely, as it is not possible to determine at this time any date certain by which the information could be disclosed without risk of harm.

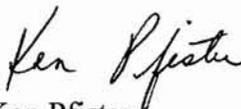
(9) Additional Information: Exemption 4 of FOIA shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The information in question clearly satisfies this test. Additionally,

where disclosure is likely to impair the government's ability to obtain necessary information in the future, it is appropriate to grant confidential treatment to that information. This information is being provided on a voluntary basis to assist the Commission in its efforts. Failure to accord confidential treatment to this information would dissuade GPC and other providers from voluntarily submitting such information in the future, thus depriving the Commission of information helpful to evaluate facts and market conditions relevant to policy issues under its jurisdiction.

If a request for disclosure occurs, please provide sufficient advance notice to the undersigned prior to any such disclosure to allow GPC to pursue appropriate remedies to preserve the confidentiality of the information.

If you have any questions or require further information regarding this request, please do not hesitate to contact me.

Sincerely,



Ken Pfister  
Vice President-Strategic Policy

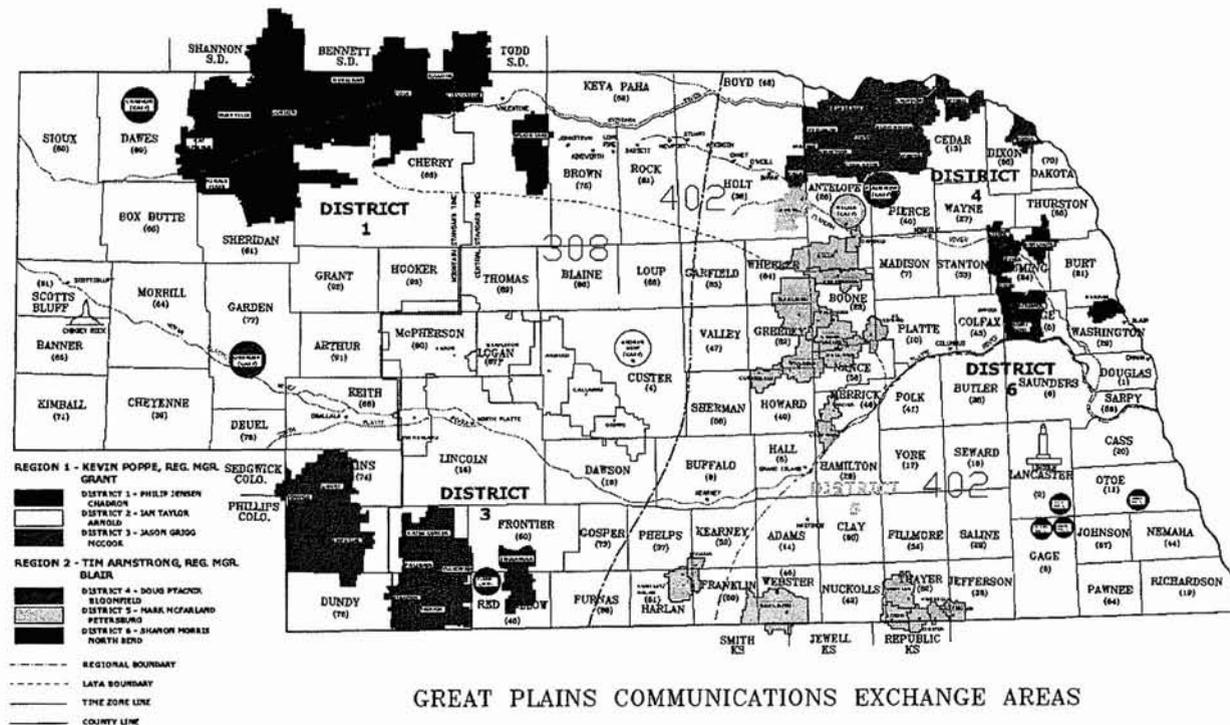
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Enclosure

# About Great Plains Communications

- Serve about 26,000 lines in 68 exchanges
- More than 14,000 square miles, with fewer than 2 lines/square mile
- About 2,500 miles of fiber transport facilities
- Fourth-generation company serving rural Nebraska for 100 years

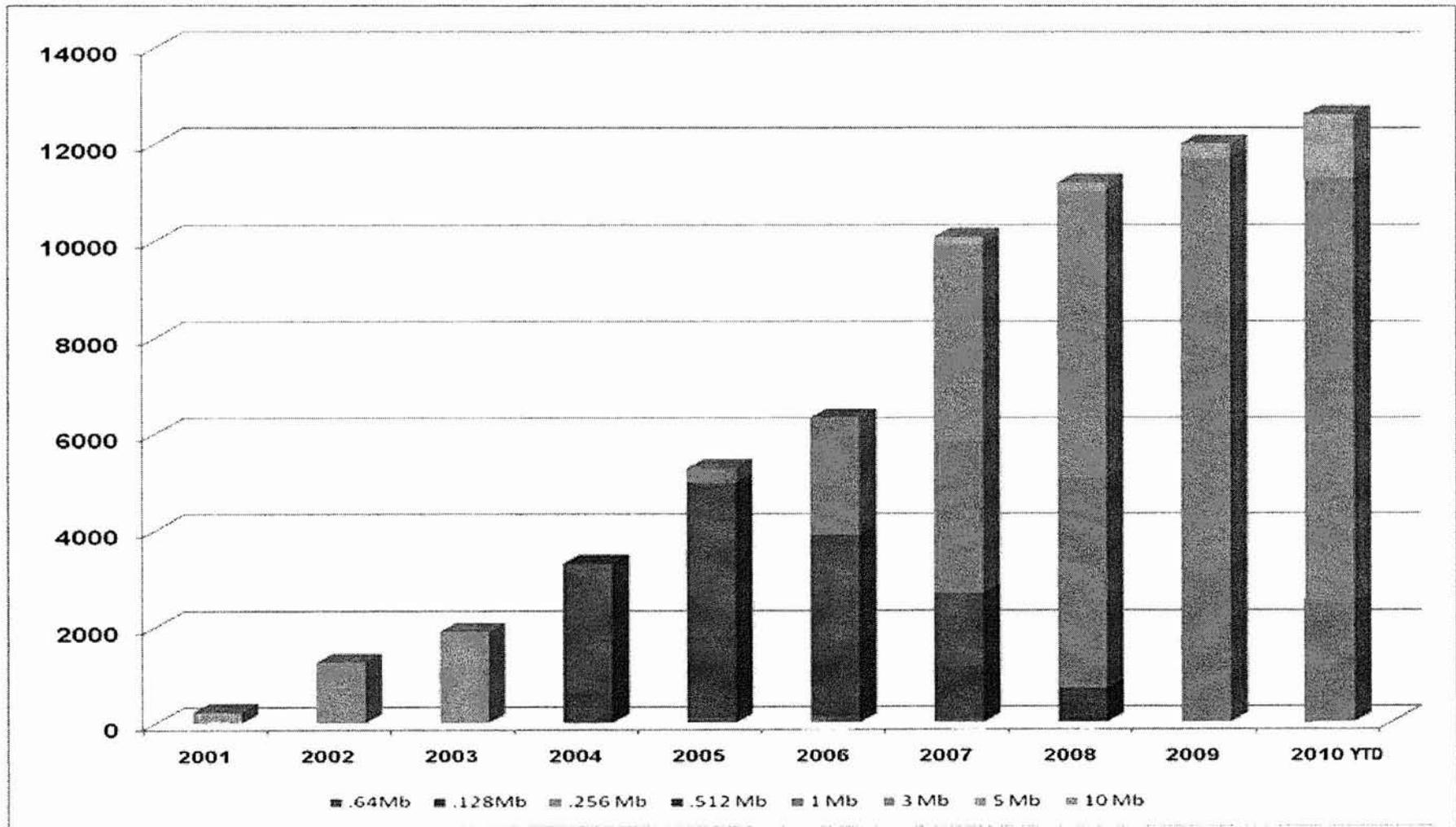
**Great Plains serves an area larger than Connecticut, New Jersey and Rhode Island combined**



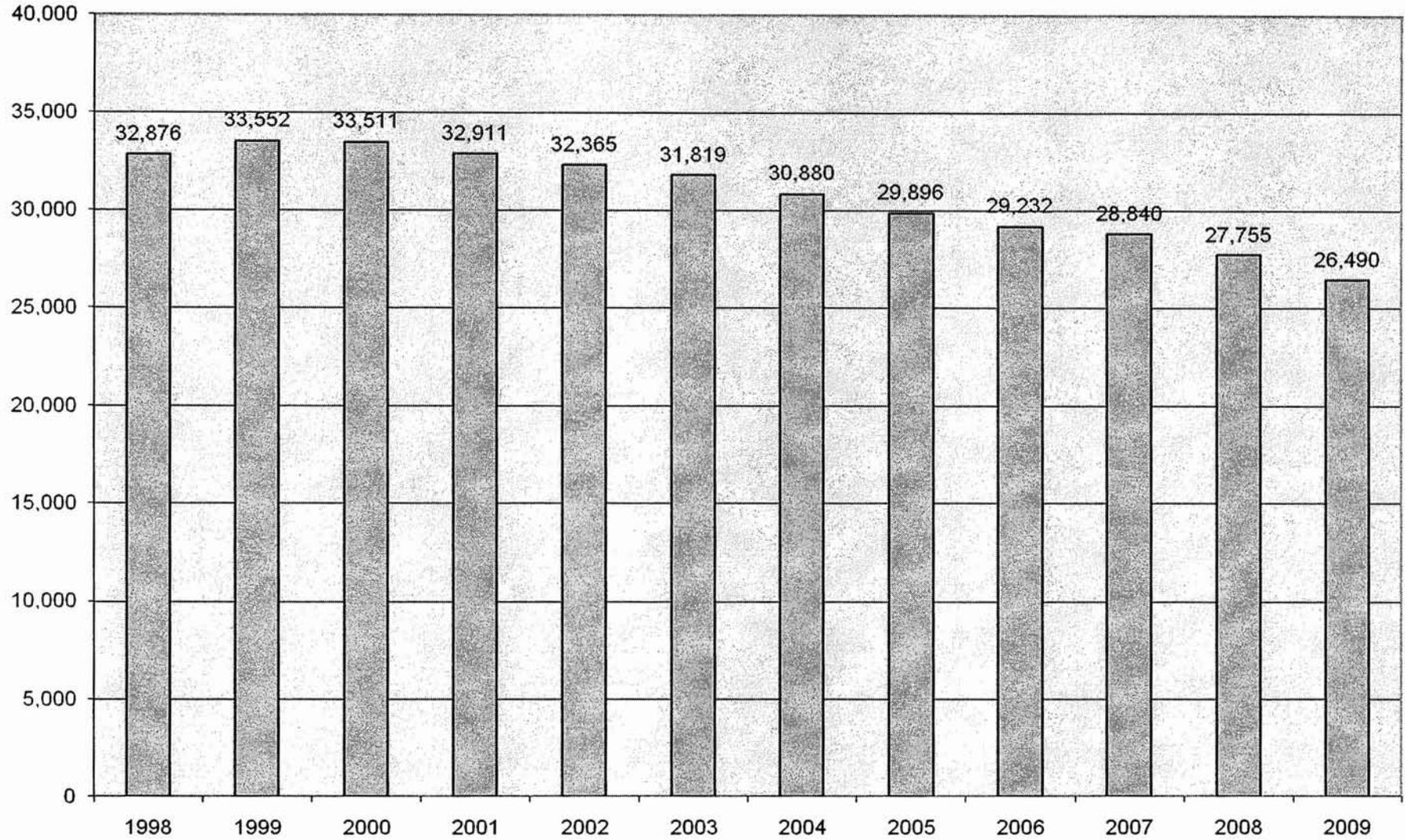
GREAT PLAINS COMMUNICATIONS EXCHANGE AREAS



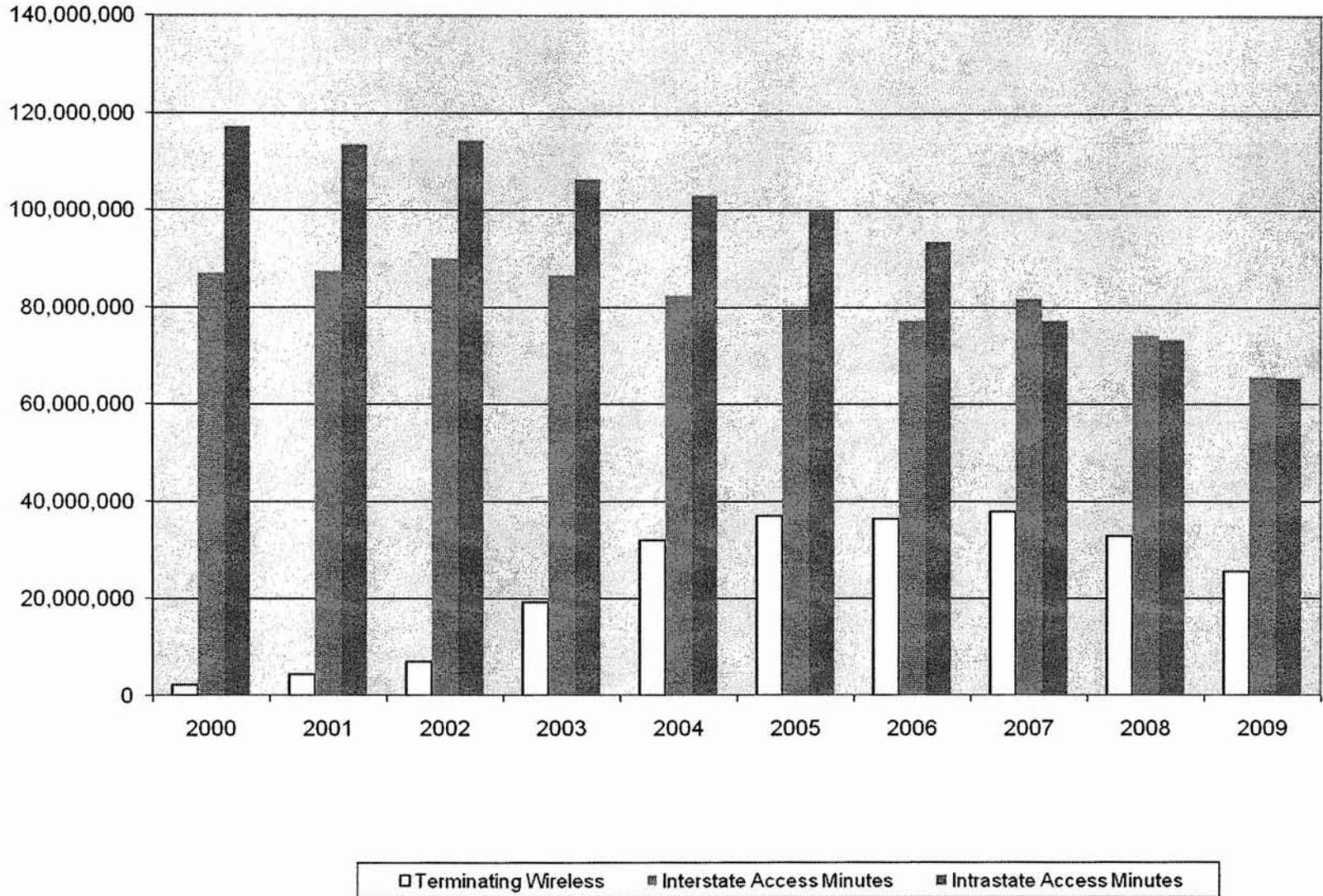
# Great Plains Has Invested in Broadband and has Experienced Consistent Growth in Subscribers/Speeds



Great Plains Total Access Lines at Year End for 1998 to 2009



Great Plains Access Minutes and Terminating Wireless Minutes 2000 to 2009



Great Plains Communications, Inc. and Subsidiaries			
Historical Rates for Retail and Wholesale Services			
Prepared July 2010			
<b>Voice Retail</b>	<b>2000</b>	<b>2005</b>	<b>2010</b>
Basic Local Service-Residence	\$15.75	\$17.50	\$19.20
Basic Local Service-Business	\$22.00	\$27.50	\$29.95
SLC charges at the caps are also billed			
<b>Internet Retail</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
Dial Up	\$21.95	\$23.95	\$23.95
1 Meg Residential	\$39.95	\$41.95	\$43.95
1 Meg Business	\$39.95	\$44.95	\$46.95
3 Meg Residential	\$59.95	\$61.95	\$63.95
3 Meg Business	\$59.95	\$64.95	\$66.95
<b>Cable TV Retail</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
<b>Group A</b>			
Limited	\$30.76	\$19.95	\$20.95
Expanded	\$38.37	\$46.20	\$48.45
Digital	\$46.37	\$54.20	\$59.45
<b>Group B</b>			
Limited	\$18.97	\$21.50	\$22.50
Expanded	\$44.47	\$47.75	\$50.00
Digital	\$52.47	\$55.75	\$61.00
<b>Group C</b>			
Limited	\$20.62	\$23.45	\$24.95
Expanded	\$49.35	\$52.20	\$55.05
Digital	\$57.35	\$60.20	\$66.05
<b>Wholesale Rates</b>			
<b>Interstate Switched Access Rates</b>	<b>2000</b>	<b>2005</b>	<b>2010</b>
CCL Originating	\$0.0100	\$0.0000	\$0.0000
CCL Terminating	\$0.0370	\$0.0000	\$0.0000
Local Switching	\$0.0163	\$0.0123	\$0.0110
Information	\$0.0005	\$0.0013	\$0.0008
Tandem Switched Transport Facility	\$0.000077	\$0.000199	\$0.000199
Tandem Switched Transport Termination	\$0.001539	\$0.002198	\$0.003919
Transport Interconnection Charge	\$0.014056	\$0.000000	\$0.000000
<b>Intrastate Switched Access Rates</b>	<b>2000</b>	<b>2005</b>	<b>2010</b>
CCL Originating	\$0.0200	\$0.0000	\$0.0000
CCL Terminating	\$0.0300	\$0.0000	\$0.0000
Local Switching	\$0.0350	\$0.0210	\$0.0210
Information	\$0.0005	\$0.0004	\$0.0004
Local Transport Facility	\$0.000097	\$0.000399	\$0.000399
Local Transport Termination	\$0.001941	\$0.005296	\$0.005296
Transport Interconnection Charge	\$0.012894	\$0.000000	\$0.000000
	<b>2000</b>	<b>2005</b>	<b>2010</b>
<b>Recip Comp Rate (Wireless Interconnection)</b>	N/A	\$0.0208	\$0.0208
(Became effective in 2003)			







**EXISTING STATE FIBER ROUTES 2010  
EXHIBIT**

The Great Plains Communications Map of existing state fiber routes for 2010 is confidential and has been redacted in its entirety.