



August 9, 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. ("Great Plains"), 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 of the FCC to discuss Great Plains operations, financial data, and access minutes.

As part of that meeting, the FCC staff requested additional information about Great Plains and its operations and services. In response to those questions, Great Plains hereby states that (i) the rate for Wild Blue is \$49.95 for 512 KB, \$69.95 for 1 MB and \$79.95 for 1.5 MB, (ii) "Other Revenue" includes revenue from interconnection, directory services, rent, late fees, billing and collection, educational video, and telemedicine, and (iii) "Corporate Operations Expenses" includes accounting and finance, external relations, human resources, legal, procurement, executive, planning and other general and administrative expenses per Part 32 of the FCC's rules. The remainder of the requested information is confidential and will be provided directly to staff by hand delivery. A request for confidential treatment of this information is attached.

Sincerely,

A handwritten signature in black ink that reads "Ken Pfister". The signature is written in a cursive, slightly slanted style.

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 9, 2010

VIA HAND DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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.¹ 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.² 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 and included in an accompanying August 9, 2010 *ex parte* notice. These materials provide sensitive information regarding the actual operations, revenues and costs for GPC and that is not publicly available. The relevant confidential materials have been marked as such and filed under seal.

¹ 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”).

² 47 C.F.R. §§ 0.457(d), 0.457(d)(2), and 0.459.

(2) Circumstances Giving Rise to Submission of Information: The information is being provided in connection with an *ex parte* discussion with Commission staff on July 30, 2010 where the staff indicated that it would helpful to understand the finances of a small rural telecommunications carrier and requested additional follow-up information. 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, finances, 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

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

Enclosure