



221 E. Fourth St.
P.O. Box 2301
Cincinnati, Ohio 45201-2301

Via Electronic Filing

March 25, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

Re: Notice of Ex Parte Presentation
CG Docket No. 10-207, Empowering Consumers to Avoid Bill Shock
CG Docket No. 09-158, Consumer Information and Disclosure

Dear Ms. Dortch:

Attached is a redacted version of the Notice of Ex Parte Contact and Request for Confidential Treatment filed by Cincinnati Bell Wireless on March 23, 2011.

Any questions can be directed to me at the above address or via phone at (513) 397-6671.

Respectfully submitted,

/s/ Patricia L. Rupich

Patricia L. Rupich
Senior Manager – Regulatory

cc: John Adams
David Tannenbaum



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**NOTICE OF EX PARTE CONTACT AND
REQUEST FOR CONFIDENTIAL TREATMENT**

**Re: Notice of Ex Parte Presentation
CG Docket No. 10-207, Empowering Consumers to Avoid Bill Shock
CG Docket No. 09-158, Consumer Information and Disclosure**

Dear Ms. Dortch:

On March 21, 2011, at the request of Commission staff, Cincinnati Bell Wireless ("CBW") representative Patricia Rupich spoke via telephone with John Adams of the Consumer and Government Affairs Bureau and David Tannebaum of the Office of General Counsel in follow up to a teleconference of March 16, 2011. Specifically, CBW was asked about the expected cost of changes CBW plans to make to its customer account management and alert systems by May 1, 2011.

CBW hereby formally requests confidential treatment of the cost information provided to Commission staff and which is provided at the end of this letter. In this regard, CBW requests that the information be withheld from public disclosure pursuant to 5 U.S.C § 552(b)(4) and §§ 0.457(d) and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457(d) and 0.459.

As required by § 0.459(b) of the Commission's Rules, CBW provides the following information:

- (1) CBW seeks confidential treatment of the cost to implement upgrades to its systems to alert customers when they have reached 100% of their text and data allotments, including separate alerts for domestic and international text messages, the cost to upgrade the My Account web portal to enable subscribers to set customized thresholds and alerts for text and data, and the cost of modifications to its billing system to free rate alert messages.

- (2) CBW is submitting this confidential information to respond to specific inquiries from Commission staff in follow up to CBW's previous Ex Parte Presentation.
- (3) The information requested contains sensitive commercial and financial information that is considered a trade secret, including vendor costs to implement certain upgrades and modifications. Pursuant to Commission Rule 0.459(d) this material should be accepted by the Commission on a confidential basis pursuant to 5 U.S.C. 552(b)(4) and the information should not be available for public inspection.
- (4) The information concerns CBW's and its vendors' costs associated with implementing various upgrades and changes to CBW's wireless text and data services and billing system. These services are subject to intense competition.
- (5) Public disclosure of this information could substantially harm CBW and its vendors by providing other actual and potential competitors with CBW's and its vendors' cost information to implement certain system upgrades and changes with respect to customer notification services. Competition for wireless voice, data and text services already exists in CBW's service area.
- (6) CBW considers this information proprietary and confidential and it has been maintained on a confidential basis within CBW and would not ordinarily be disclosed to parties outside the company.
- (7) This information should never be disclosed to the public, as it is commercially sensitive business information. CBW has not previously disclosed this information to third parties other than the vendors directly involved.
- (8) The information should be kept confidential indefinitely. Confidential treatment must be accorded for as long as the information would provide a basis for competitors to assess CBW's costs in specific areas. CBW cannot determine at this time when the information might become obsolete for these purposes.

As stipulated in Section 0.459(e) of the Commission's Rules, CBW respectfully requests that the information submitted voluntarily herewith be returned if CBW's request for confidentiality is denied.

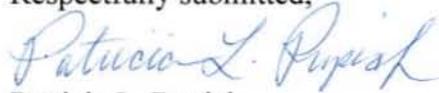
CONFIDENTIAL INFORMATION: In response to the Commission staff's inquiry, the cost for CBW and its vendors to implement a package of upgrades and changes planned to be in place by May 1, 2011, including those discussed with staff, is approximately \$ [REDACTED].

Marlene H. Dortch
March 23, 2011
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REDACTED

All correspondence and inquiries with this request should be addressed to Patricia Rupich, Cincinnati Bell, 221 East Fourth Street, Room 103-1280, Cincinnati, Ohio 45202.

Respectfully submitted,

A handwritten signature in blue ink that reads "Patricia L. Rupich". The signature is written in a cursive style with a large initial "P".

Patricia L. Rupich
Senior Manager – Regulatory

cc: John Adams
David Tannenbaum