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March 28, 2011

MAR 28 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

FOR PUBLIC INSPECTION

Re: **Tri-County Telephone Association, Inc. (WC Dkt. No. 08-239)**  
**CONFIDENTIAL TREATMENT REQUESTED**

Dear Ms. Dortch:

On February 14, 2011, Tri-County Telephone Association, Inc. ("TCT") submitted a filing including a letter responding to questions posed by the staff of the Wireline Competition Bureau, as well as supporting documentation (the "February 14 Filing"). TCT has become aware that the February 14 Filing included outdated information. TCT therefore makes the instant filing to provide corrected data. Attached to the original of this letter is the confidential attachment ("Attachment") meant to supersede the erroneous attachment to the February 14 Filing. TCT requests confidential treatment of the revised Attachment under Section 0.459 of the Commission's rules<sup>1</sup> of TCT's Filing, which has been labeled "Confidential — Not for Public Inspection."

Like the February 14 Filing itself, TCT's revised Attachment contains sensitive company information not available to the public, including competitively sensitive information about TCT's costs, revenues, universal service fund receipts, and business operations, which could give competitors visibility into TCT's operations and competitive position.

Treating this information as confidential is consistent with section 0.459(b) of the Commission's rules:

1. Confidential treatment is requested for the dollar values reflecting TCT's revenues and costs, as well as related information contained on the spreadsheet attached to its letter. The information for which confidentiality is requested is clearly marked in the attached pleading (the "Confidential Information").
2. This information is submitted in response to a request by Commission staff in connection with a petition that TCT has filed with the Commission.

<sup>1</sup> 47 C.F.R. § 0.459.

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List A B C D E

3. The information being submitted is commercially and financially sensitive and is privileged. The Attachment provides detailed information regarding TCT's costs, revenues, universal service receipts, and other financial and business matters that is not otherwise publicly available.
4. Every element of TCT's business is subject to competition. TCT provides wireline voice service and resells cellular wireless voice service, and provides broadband Internet access and video services. At least two other mobile voice providers offer similar voice communications and mobile data services in TCT's territory. In addition, one other entity provides wireline voice communications service, wireline broadband Internet access, and video service. Satellite broadband Internet access is also available throughout TCT's operating territory.
5. The release of the Confidential Information will cause substantial competitive harm to TCT. Disclosure of TCT's revenues, costs, universal service receipts, and related financial information contributions would give TCT's actual and/or would-be competitors access to privileged information that would affect the actions of those competitors. Competitors seeking to compete with TCT could utilize such information to position their pricing and/or extrapolate sensitive data regarding TCT's financial condition and plans for the future.
6. TCT considers the information in the Attachment to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
7. The information in TCT's Attachment is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel, tax accountants, and other similar parties subject to confidentiality requirements.
8. The information provided in the Attachment should never be released for public inspection, as this document contains proprietary company information that is competitively and financially sensitive. At minimum, the financial information in the Attachment should be protected for not less than five years.

For the foregoing reasons, TCT respectfully requests that the Commission provide for confidential treatment for its revised Attachment.

If you have any questions regarding the Attachment, or this confidentiality request, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By: /s/ Russell P. Hanser  
Russell P. Hanser

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Enclosures

cc: Pam Arluk, Assistant Chief, Pricing Policy Division

**Exhibit**

**Redacted From**

**Public Filing**