

August 5, 2011

VIA ECFS (REDACTED)

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Re: *Response to Request for Information, WT Docket No. 11-65*

Dear Ms. Searcy:

Crown Castle International Corp. (“Crown Castle”), by its attorneys, hereby submits its response to the July 26, 2011 Request for Information from the Chief, Wireless Telecommunications Bureau. In lieu of the information called for in Column AH of the spreadsheet, which is not available, Crown Castle has supplied, as Exhibit 1, alternative carrier contribution data, based on discussions with the Commission Staff.

Crown Castle designates the information supplied in the attached paper and electronic documents, to be Highly Confidential Information in its entirety. This designation is consistent with the definition of Highly Confidential Information in the Second Protective Order (Revised), DA 11-1100 (June 22, 2001), as discussed in the next paragraph.

The information as provided herewith (the “Information”) is not available from publicly available sources. In fact, the Information is kept strictly confidential by Crown Castle. The Information consists of highly granular and detailed information regarding Crown Castle’s entire inventory of towers and its tenants on those towers, which constitutes some of Crown Castle’s most sensitive business data. If the Information were to be released to competitors or to Crown Castle’s tenants or suppliers, it would allow those persons to gain a significant advantage in the marketplace and/or in negotiations. Accordingly, the Information is entitled to protection from disclosure under the Freedom of Information Act (“FOIA”) and the Commission’s implementing rules as “trade secrets or commercial or financial information obtained from a person and privileged or confidential.” 5 U.S.C. § 552b(c)(4); 47 C.F.R. § 0.457(d).

The Information falls squarely within the eleventh category of Highly Confidential Information listed in the most recent version of Appendix A to the Second Protective Order (Revised): “Information that provides detailed or granular engineering capacity information or

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information about specific facilities, including collocation sites, cell sites, maps of network facilities, or information about the backhaul provider to a site.”¹ Accordingly, we request that Appendix A be amended to include Crown Castle’s provision of the Information under category 11.

Crown Castle notes that the Information is being submitted voluntarily under the expectation that it will be treated as Highly Confidential Information. Pursuant to the Commission’s FOIA implementing regulations, 47 C.F.R. § 0.459(e), Crown Castle requests that the Information be returned without consideration if the request for treatment as Highly Confidential Information is denied.

Respectfully submitted,

/s/ William J. Sill
William J. Sill
Michael Deuel Sullivan
Counsel to Crown Castle International Corp.

Enclosures

cc: Kathy Harris

¹ Letter to Peter J. Schildkraut, Esq., DA 11-1214, Appendix A at A-4 (WTB July 19, 2011).

EXHIBIT 1

[HIGHLY CONFIDENTIAL INFORMATION REDACTED]

SPREADSHEET

[HIGHLY CONFIDENTIAL INFORMATION REDACTED]