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June 29, 2012

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VIA FEDERAL EXPRESS

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
9300 Hampton Drive
Capitol Heights, MD 20743

Received & Inspected

JUN 02 2012

FCC Mail Room

**Re: WC Docket No. 10-90
2012 Eligible Telecommunications Carrier Annual Reports pursuant to
47 C.F.R. § 54.313**

Dear Ms. Dortch:

Please find enclosed for filing in the above docket pursuant to 47 C.F.R. § 54.313 the original and four (4) copies of the following documents:

- PUBLIC VERSIONS OF 2012 ELIGIBLE TELECOMMUNICATIONS CARRIER ANNUAL REPORTS
 - Exhibit A – ETC Designated Service Area
 - Exhibit B – Network Outages
 - Exhibit C – Unfulfilled Requests for Service
 - Exhibit D – Company Information
- (separate marked envelopes) CONFIDENTIAL VERSIONS OF 2012 ELIGIBLE TELECOMMUNICATIONS CARRIER ANNUAL REPORTS
 - Exhibit A – ETC Designated Service Area
 - Exhibit B – Network Outages
 - Exhibit C – Unfulfilled Requests for Service
 - Exhibit D – Company Information

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- REQUEST FOR CONFIDENTIAL TREATMENT OF SPECIFIED EXHIBITS TO 2012 ELIGIBLE TELECOMMUNICATIONS CARRIER ANNUAL REPORTS

The Request for Confidential Treatment is submitted pursuant to 47 C.F.R. §§ 0.457(d) and 0.459 and is made with respect to exhibits marked as Confidential Exhibits B and C. Materials so designated as confidential are enclosed in a separate, marked envelope.

These filings are submitted for the designated common carriers and study areas listed below:

Study Area Name	State	SAC
Cellco Partnership d/b/a Verizon Wireless	AR	409003
Midwest Wireless Iowa, LLC	IA	359010
Iowa RSA 7 Limited Partnership	IA	359070
Iowa 8 Limited Partnership	IA	359071
ALLTEL Communications, LLC	KS	419905
ALLTEL Communications, LLC	LA	279009
ALLTEL Communications, LLC/MI RSA #9 Limited Partnership	MI	319010/319019
WWC Holding Co., Inc.	MN	369001
Midwest Wireless Communications, LLC	MN	369002
RCC Minnesota, Inc.	MN	369004
ALLTEL Communications, LLC	MS	289010
Rural Cellular Corporation	MS	289002
Bismarck MSA Limited Partnership	ND	389005
North Central RSA 2 of North Dakota Limited Partnership	ND	389006
Northwest Dakota Cellular of North Dakota LP	ND	389007
North Dakota RSA 3 Limited Partnership	ND	389008
Badlands Cellular of North Dakota Limited Partnership	ND	389009
North Dakota 5 - Kidder Limited Partnership	ND	389010
Alltel Communications of Nebraska, Inc.	NE	379013
WWC License LLC	SD	399018
RCC Minnesota, Inc.	SD	399003
WWC Texas RSA Limited Partnership	TX	449003
Alltel Communications, LLC	TX	449034

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Study Area Name	State	SAC
Midwest Wireless Wisconsin, LLC	WI	339006
Wisconsin RSA #3 Limited Partnership	WI	339016
ALLTEL Communications, LLC/WI RSA #1 Limited Partnership	WI	339017/339023
ALLTEL Communications, LLC	WV	209008

If you have any questions, please contact me.

Sincerely,



Matthew A. Slaven

MAS/pk
Enclosures

cc: Universal Service Administrative Company (HCFilings@hcli.universalservice.org)

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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JUL - 2 2012

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In the Matter of
Connect America Fund

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)

WC Docket No. 10-90

**REQUEST FOR CONFIDENTIAL TREATMENT OF SPECIFIED EXHIBITS TO
2012 ELIGIBLE TELECOMMUNICATIONS CARRIER ANNUAL REPORTS**

June 29, 2012

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(802) 654-5093

For the reasons stated herein, Cellco Partnership d/b/a Verizon Wireless, on behalf of itself and its wireless subsidiaries and affiliates designated as eligible telecommunications carriers (“ETCs”) (“Verizon Wireless” or the “Company”), hereby requests that the enclosed exhibits designated as **Confidential Exhibit B** (Outage Reports) and **Confidential Exhibit C** (Unfulfilled Requests for Service) to the 2012 Eligible Telecommunications Carrier Annual Reports enumerated below be treated as confidential and not routinely available for public inspection pursuant to 47 C.F.R. §§ 0.457(d) and 0.459. Redacted copies of the exhibits designated as **Confidential Exhibit B** and **Confidential Exhibit C** are being filed separately today for inclusion in the public record.

For purposes of this filing, the Company’s request for confidential treatment applies to exhibits designated as **Confidential Exhibit B** and **Confidential Exhibit C** to the 2012 Eligible Telecommunications Carrier Annual Reports submitted for the designated common carriers and study areas listed below:

Study Area Name	State	SAC
Cellco Partnership d/b/a Verizon Wireless	AR	409003
Midwest Wireless Iowa, LLC	IA	359010
Iowa RSA 7 Limited Partnership	IA	359070
Iowa 8 Limited Partnership	IA	359071
ALLTEL Communications, LLC	KS	419905
ALLTEL Communications, LLC	LA	279009
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WWC Holding Co., Inc.	MN	369001
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Alltel Communications of Nebraska, Inc.	NE	379013
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ALLTEL Communications, LLC/WI RSA #1 Limited Partnership	WI	339017/339023
ALLTEL Communications, LLC	WV	209008

The exhibits designated as **Confidential Exhibit B** and **Confidential Exhibit C** contain information that qualifies as “commercial or financial information” that “would customarily be guarded from competitors,” regardless of whether or not such materials are protected from disclosure by a privilege. *See* 47 C.F.R. § 0.457(d); *see also Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) (“[W]e conclude that financial or commercial information provided to the Government on a voluntary basis is ‘confidential’ for the purpose of Exemption 4 if it is the kind that would customarily not be released to the public by the person from whom it was obtained.”). Disclosure of this sensitive information could place Verizon Wireless at a competitive disadvantage that warrants protection under 47 C.F.R. § 0.459. Verizon Wireless would be placed at a significant disadvantage if this information were revealed to competing service providers, who stand to benefit competitively from any knowledge of the redacted information included in these materials. If the redacted information were disclosed to competitors of Verizon Wireless, they could use such information to compete against Verizon Wireless or take other action that would place the Company at a substantial competitive disadvantage. The redacted material is not and has not previously been made available to the public, and Verizon Wireless has taken internal precautions to ensure that such information is not disclosed to the public.

The exhibits designated as **Confidential Exhibit B** contain highly sensitive network outage information required by 47 C.F.R. § 54.209(a). Commission Rule 54.209(a) was modeled on the outage reporting requirements in 47 C.F.R. Part 4. When it adopted the Part 4 reporting requirements, the Commission found that such data presents national security and competitive concerns and should be deemed confidential when filed with the Commission. *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830, ¶ 3 (2004) (“This data, though useful for the analysis of past and current outages in order to increase the reliability and security of telecommunications networks in the future, could be used by hostile parties to attack those networks, which are part of our Nation’s critical information infrastructure. The disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity. We therefore will treat the information that will be provided as confidential.”) The information in exhibits designated as **Confidential Exhibit B** is therefore entitled to be treated as confidential for these same reasons.

The exhibits designated as **Confidential Exhibit C** contain confidential information concerning specific subscriber locations, the Company’s level of service at such locations, and efforts made by the Company to extend service to the specified locations. This confidential information qualifies as “commercial or financial information” that “would customarily be guarded from competitors,” regardless of whether or not such materials are protected from disclosure by a privilege. *See* 47 C.F.R. § 0.457(d); *see also Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) (“[W]e conclude that financial or commercial information provided to the Government on a voluntary basis is ‘confidential’ for the purpose of

Exemption 4 if it is the kind that would customarily not be released to the public by the person from whom it was obtained.”). Verizon Wireless would be placed at a significant disadvantage if this information were revealed to competing service providers, who stand to benefit competitively from any knowledge of the redacted information included in these materials. Likewise, if made public, the Company’s proprietary service level data could be used by its competitors to derive an unfair competitive financial benefit through targeted marketing or other initiatives.

Accordingly, the enclosed exhibits designated **Confidential Exhibit B** and **Confidential Exhibit C** warrant protection from public disclosure pursuant to 47 C.F.R. §§ 0.457(d) and 0.459.

Respectfully submitted,

June 29, 2012

BRIGGS AND MORGAN, P.A.

By 

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