

REDACTED FOR PUBLIC INSPECTION

January 9, 2013

VIA HAND DELIVERY AND ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth St. N.W.
Washington, D.C. 20554

Re: Comments of Cox Communications on List of Potentially Unserved Census Blocks on National Broadband Map for Connect America Phase I Incremental Support
WC Docket 10-90, DA 12-2001
Request for Confidential Treatment

Dear Ms. Dortch:

Cox Communications, Inc., (“Cox”), by its attorney and pursuant to Section 0.459 of the Commission’s rules,¹ hereby requests confidential treatment of the census block data submitted as Exhibit A to its comments in the above-referenced proceeding. (A redacted, public version of the comments is being submitted under separate cover.) For the reasons described below, the Commission should grant confidential treatment for the census block information.

Cox requests confidential treatment for this information because it is commercially sensitive to Cox. Information concerning the specific census blocks within which Cox provides service to the public would be valuable to Cox’s competitors, as it would permit them to more effectively target their marketing and service offerings. As a consequence, Cox does not release this information to the public and takes specific steps to maintain the security of this information within the company. Indeed, the information provided with the comments was generated specifically to be submitted to the Commission, and would not ordinarily have been made available even within Cox.

As a consequence, this information qualifies for exemption from disclosure under Section 0.457(d) of the Commission’s rules, which provides that trade secrets and other similarly sensitive commercial information will not be made available for public inspection.² Given the

¹ 47 C.F.R. § 0.459.

² 47 C.F.R. § 0.457(d).

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sensitive nature of the information and that it had to be generated specifically to respond to the Commission's request for comments, this information falls squarely within Section 0.457(d) and should be exempt from disclosure.

Please inform me if any questions should arise in connection with this submission.

Respectfully submitted,

/s/

J.G. Harrington

Counsel to Cox Communications, Inc.

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