

**CONFIDENTIAL - NOT FOR PUBLIC DISCLOSURE OR INSPECTION**

**VIA HAND DELIVERY**

September 30, 2013

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

**Re: Request for Confidential Treatment**

Dear Ms. Dortch:

Deltacom, Inc. (“Deltacom” or the “Company”), pursuant to 47 C.F.R. §§ 0.457, 0.459, requests that portions of its Request for Review of a Decision of the Universal Service Administrator (“Request”) be treated as confidential and not subject to public inspection. Certain portions of the Request as identified further below contain confidential and proprietary information that, if subject to public disclosure, would cause significant commercial and competitive harm to Deltacom. As described below, Deltacom’s request satisfies the standards for grant of this request as set forth in Sections 0.457 and 0.459 of the Commission’s Rules.

In accordance with Section 0.459(b) and in support of its request, Deltacom provides the following information:

(1) Identification of Confidential Materials: Deltacom seeks confidential treatment of specific information relating to Deltacom’s provision of private line and Virtual Private Network (VPN) services as contained in the USAC Internal Audit Division Report of Deltacom, Inc. (USAC Audit No. CR2011CP025) dated May 16, 2013 (“Final Audit Report”), excerpts of which have been included with the Request as Exhibit A, and in Deltacom’s response to USAC private line information request, which is included with the Request as Exhibits B, C, & D. Specifically, Company information on revenues and customer data, that is designated as confidential, are appropriately marked “BEGIN CONFIDENTIAL” and “END CONFIDENTIAL” in the Request and shown in yellow highlights in Exhibit A. The confidential information has been redacted from the Request, and from Exhibit D and appropriately marked by black shading [REDACTED]. Exhibits B and C have been redacted in their entirety and are only provided with the confidential version of the filing. A “REDACTED” version of the Request and the accompanying Exhibits intended for public inspection has been filed in the Commission’s Electronic Comment Filing System.

(2) Circumstances Giving Rise to Submission of Information: Deltacom requests that specific information in the Request be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential includes the excerpts from the USAC Final Audit Report and information

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regarding Deltacom's USAC contribution amount and the degree to which such amount would change based on USAC's recommendations, and in Deltacom's response to USAC private line information Request. This information is competitively sensitive information that Deltacom maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on Deltacom since it would provide competitors with commercially sensitive information.

(3) Degree to Which Information is Commercial or Financial: The information designated in the Request and in the Exhibits as Confidential is of a highly sensitive commercial nature, containing customer data and financial information concerning aspects of Deltacom's business.

(4) Degree to Which the Information Concerns a Service Subject to Competition: Deltacom is a competitive telecommunications service provider operating nationwide. Thus, by definition, Deltacom's telecommunications services are subject to competition and the release of this confidential and proprietary information would cause Deltacom competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of Deltacom's business at a level of detail not currently available to the public. Such information is directly applicable to how Deltacom operates and provides telecommunications services subject to substantial competition from numerous other telecommunications providers.

(5) How Disclosure Could Result in Substantial Harm: Disclosure of Deltacom's confidential information regarding its provision of private line and VPN services would give its competitors a significant advantage by revealing sensitive business information about Deltacom's customer base, product mix and revenues. This data could be used by competitors to damage Deltacom's position in the market and future potential growth.

(6) Measures Taken to Prevent Disclosure: The Request and Exhibits provide information relating to Deltacom's customer data and financial operations. Deltacom holds all such information designated as "CONFIDENTIAL," within the Request in strict confidentiality and does not permit access to such information to any persons other than employees who require access to this information for the specific purpose of conducting business on behalf of Deltacom.

(7) Public Access to Information, Third Party Disclosure: As noted above, Deltacom has not made this information publicly available through any previous disclosures.

(8) Justification of the Period During Which the Material Should Not be Publicly Available: Deltacom requests that the Commission hold this information out of public view, and cannot determine at this time any date on which this information should not be considered confidential.

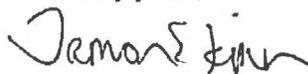
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(9) Additional Information: Release of the forgoing information would have a serious detrimental impact on the business operations and plans of Deltacom. Because of the competitively sensitive nature of this information, Deltacom respectfully requests that the Commission treat this filing as confidential and withhold the same from public inspection for the timeframe set forth herein. Deltacom has simultaneously filed a copy of the filing marked "REDACTED - FOR PUBLIC INSPECTION" so that the non-confidential information contained in the filing may be made available to the public.

Please contact the undersigned should you have any questions concerning the attached documentation, or Deltacom's request for confidentiality pursuant to the Commission's rules. An original and four (4) copies of the confidential version of the Request are enclosed. Please date-stamp the enclosed extra copy of this filing and return it in the self-addressed envelope provided.

Sincerely yours,



Tamar E. Finn

Counsel to Deltacom, Inc.