

8300 Greensboro Dr.
Suite 1200
McLean, VA 22102
WWW.FCCLAW.COM

Robert S. Koppel
(703) 584-8669
bkoppel@fcclaw.com
NOT ADMITTED IN VA

LNGS | LUKAS,
NACE,
GUTIERREZ
& SACHS, LLP

June 30, 2014

VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A306
Washington, D.C. 20554

**Re: FCC Form 481 – Carrier Annual Report for Calendar Year 2013
WC Docket No. 10-90**

Dear Secretary Dortch:

On behalf of Bristol Bay Telephone Cooperative (“BBTC”), SAC 613003 in Alaska, enclosed is a confidential version of BBTC’s FCC Form 481 Carrier Annual Report submitted pursuant to Section 54.313 of the Commission’s Rules (“Form 481 Report”). The enclosed confidential version of the Form 481 Report has been marked “**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**”

An additional copy of this filing has been provided, which you are requested to date-stamp and return in the envelope provided.

BBTC is also submitting, via an electronic filing, a redacted public copy of the Form 481 Report. The redacted public copy has been marked “**REDACTED – FOR PUBLIC INSPECTION.**”

BBTC respectfully requests confidential treatment of certain information provided in its Form 481 Report because this information is competitively sensitive and its disclosure would have a negative competitive impact on BBTC were it made publicly available. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§ 0.457 and 0.459.

47.C.F.R. § 0.457

Specific information in the Form 481 Report is confidential and proprietary to BBTC as “trade secrets and commercial or financial information” under 47 C.F.R. § 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with BBTC’s ongoing business and operations.

47 C.F.R. § 0.459

Specific information in the Form 481 Report is also subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

Information for which confidential treatment is sought

BBTC requests that its five year plan (Line 112) and the financial information (Line 3017) filed with the Rural Utilities Service (“RUS”) – and filed with Form 481 -- be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The descriptive document relating to the financial information is marked “**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**”

Information relating to non-public planning and financial information is competitively sensitive information that BBTC maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on BBTC since it would provide competitors with commercially sensitive information.

Commission proceedings in which the information was submitted

The information is being submitted in BBTC’s Form 481 Report, WC Docket No. 10-90.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The information in question is competitively sensitive information which is not normally released to the public as such release would have a substantial negative competitive impact on BBTC.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm

The release of this confidential and proprietary information would cause BBTC competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of BBTC’s business at a level of detail not currently available to the public.

Marlene H. Dortch, Secretary
Federal Communications Commission
June 30, 2014
Page 3

Measures taken by BBTC to prevent unauthorized disclosure and availability of the information to the public and extent of any previous disclosures of the information to third parties

BBTC has treated and continues to treat the non-public information disclosed in this Form 481 Report as confidential and has protected it from public disclosure to parties outside of the company.

Justification of the period during which BBTC asserts that the material should not be available for public disclosure

BBTC cannot determine at this time any date on which this information should not be considered confidential.

Other information BBTC believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable Commission decisions, the information in question should be withheld from public disclosure.

Please contact the undersigned if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,



David L. Nace
Robert S. Koppel

Counsel to:
Bristol Bay Telephone Cooperative

Enclosure