

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Complaint of Freedom Ring Communications
LLC d/b/a BayRing Communications Against
Verizon New Hampshire re: Access Charges

Docket No. 06-067

MOTION FOR CONFIDENTIAL TREATMENT

Sprint Communications Company L.P. and Sprint Spectrum L.P. (collectively “Sprint”) hereby move for a protective order, pursuant to RSA 91-A:5, IV and N.H. Admin. Rules Puc 203.08, to prevent public disclosure of certain proprietary and confidential information contained in the Affidavit of Kevin A. Bearden dated March 29, 2012 (“Bearden 3/29 Affidavit”). In support of this Motion, Sprint states the following:

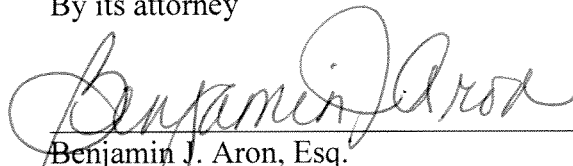
1. The information over which Sprint seeks confidential treatment consists of certain information contained in the Bearden 3/29 Affidavit regarding outstanding FairPoint CCL charges and Sprint CCL payments to FairPoint. Such information should be treated as proprietary and confidential information of Sprint and FairPoint (“Confidential Information”). FairPoint has previously sought confidential treatment of the same information.
2. The Confidential Information pertains to the provision of services, volume of traffic, payment history, and illustrates financial information related to those services that is not publicly known or knowable. Sprint takes measures to prevent dissemination of such information in the ordinary course of business. The Confidential Information is only available to and known by a limited number of people inside Sprint. The Confidential Information relates to the Sprint’s volume of traffic exchanged with FairPoint and payments to FairPoint for traffic. Such information is exempt from public disclosure pursuant to RSA 91-A:5, IV.

3. The Confidential Information derives independent economic value from not being generally known and not being readily ascertainable via legal means by other persons who can obtain economic value from its disclosure and use. Disclosure of such information could adversely impact competition and pricing in the market. Failure to maintain the confidentiality of the Confidential Information would provide competitors insight into the extent and breadth of Sprint's operations that is otherwise unavailable.
4. It is appropriate for the Commission to limit access to the Confidential Information due to its inherently sensitive nature. No legitimate purpose or public interest would be served by disclosing the Confidential Information to any.
5. Finally, granting confidential treatment over the Confidential Information will not adversely affect any party, and would be consistent with earlier requests for the same treatment by FairPoint.

WHEREFORE, Sprint respectfully requests that the Commission grant a Protective Order requiring the Confidential Information to be treated confidentially.

Respectfully submitted
Sprint Communications Company L.P.
Sprint Spectrum L.P.

By its attorney

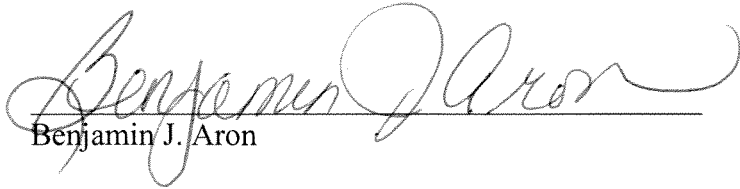
A handwritten signature in cursive script, reading "Benjamin J. Aron", is written over a horizontal line.

Benjamin J. Aron, Esq.
Sprint Nextel Corporation
12502 Sunrise Valley Drive | VARESA0209-2d677
Reston, Virginia 20196
Office Phone: (703) 592-7618
Fax: (703) 433-4804
Benjamin.Aron@Sprint.com

Certificate of Service

I hereby certify that a PDF copy of the foregoing Motion will be forwarded to the electronic service list on March 30, 2012.

Dated: March 29, 2012


Benjamin J. Aron