

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

DT 12-\_\_\_\_\_

**Merrimack County Telephone Company and Wilton Telephone Company;  
Request to Overturn Decision of the North American Numbering Plan Administrator**

**MOTION FOR CONFIDENTIAL TREATMENT**

Pursuant to RSA 91-A:5, IV and N.H. Admin. Rules Puc 203.08, Merrimack County Telephone Company and Wilton Telephone Company (“TDS”) hereby requests a protective order to prevent public disclosure of the confidential and proprietary information included in its above captioned request dated May 29, 2012. In support of this Request, TDS states as follows:

1. The information for which TDS seeks confidential treatment consists of certain designated portions of its letter dated May 29, 2012 and attachments thereto. This information should be treated as proprietary and confidential information of TDS (“Confidential Information”).
2. The Confidential Information pertains to the provision of competitive services and sets out information related to those subjects that is not public knowledge or published elsewhere and for which TDS has taken measures to prevent dissemination in the ordinary course of business. In particular, it contains information related to the TDS’s use of numbering resources.<sup>1</sup> As such, it constitutes confidential, commercial and financial information exempt from public disclosure pursuant to RSA 91-A:5, IV.
4. The Confidential Information derives economic value from not being generally known to and not being readily ascertainable by proper means by other persons who can obtain

---

<sup>1</sup> Many aspects of number resource management already qualify for confidential treatment on a routine basis. See Rule Puc 201.06(a)(20)-(22).

economic value from its disclosure and use. Because the telecommunications industry is highly competitive, TDS believes that disclosure of this information would impede full and fair competition. Unrestricted availability of this information would provide competitors with insight into the operations of TDS and the subject carriers that is otherwise unavailable.

5. Due to the sensitive nature of the Confidential Information, it is appropriate for the Commission to limit access to it. The Confidential Information should solely be used by the Commission in exercising its governmental functions in considering TDS's Request. There is no legitimate purpose or public interest to be served in disclosing the Confidential Information to any person other than the appropriate staff of the Commission. Moreover, confidential treatment of this information will not adversely affect any interested party.

WHEREFORE, TDS respectfully requests that the Commission grant a Protective Order allowing the Confidential Information to be treated as confidential.

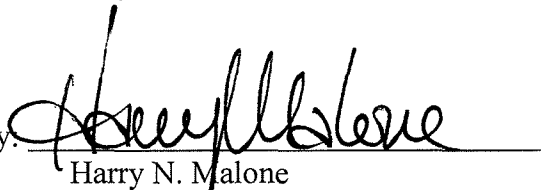
Respectfully submitted,

MERRIMACK COUNTY TELEPHONE  
COMPANY  
WILTON TELEPHONE COMPANY

By Their Attorneys,  
DEVINE, MILLIMET & BRANCH,  
PROFESSIONAL ASSOCIATION

Dated: May 29, 2012

By:



Harry N. Malone  
111 Amherst Street  
Manchester, NH 03101  
(603) 695-8532  
hmalone@devinemillimet.com