

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

**MOTION FOR CONFIDENTIAL TREATMENT**

Pursuant to RSA 91-A:5, IV and N.H. Admin. Rules Puc 203.08, Northland Telephone Company of Maine, Inc. d/b/a FairPoint Communications ("FairPoint") hereby moves for a protective order to prevent public disclosure of the confidential and proprietary information included in its FCC compliance related filing with the Commission dated June 17, 2015. In support of this Motion, FairPoint states as follows:

1. The information for which FairPoint seeks confidential treatment consists of certain designated portions of the following work papers:

- All Tariff Period Projected Lines (Primary/Non-Primary Residential/BRI)
- ARC Eligible Tariff Period Projected Lines(Primary/Non-Primary Residential/BRI)
- All Tariff Period Projected Lines (SLB)
- ARC Eligible Tariff Period Projected Lines (SLB)
- All Tariff Period Projected Lines (MLB)
- ARC Eligible Tariff Period Projected Lines (MLB)
- Total ARC Eligible Projected Line Demand
- Maximum Residential ARC Revenue Opportunity (from eligible lines)
- Maximum Primary/Non-Primary Residential/BRI ARC Revenue Opportunity
- Maximum SLB ARC Revenue Opportunity
- Maximum MLB ARC Revenue Opportunity
- Total Maximum ARC Revenue Opportunity
- Recovery Allocated to Res/SLB: ( 51.915(e)(4))
- Recovery Allocated to MLB: ( 51.915(e)(4))
- Tariff Period Projected Eligible Line Demand
- Eligible Recovery/Revenue
- Maximum ARC Revenue Shortfall
- Maximum CAF ICC Support
- Access Reductions
- Net Reciprocal Compensation
- Net CMRS

These documents should be treated as proprietary and confidential information of FairPoint (“Confidential Information”).

2. The Confidential Information pertains to the provision of competitive services and sets forth trade secrets and other confidential information related to marketing and planning that is not general public knowledge or published elsewhere and for which FairPoint has taken measures to prevent dissemination in the ordinary course of business. In particular, it contains information about FairPoint’s demand levels for these services. 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 economic value from its disclosure and use. Because the telecommunications industry is highly competitive, FairPoint believes that disclosure of this information would place it at a competitive disadvantage, impede full and fair competition, and undermine its business prospects in New Hampshire. Unrestricted availability of this information would provide competitors with insight into FairPoint’s strategies and business plans that is otherwise unavailable. Moreover, confidential treatment of this information will not adversely affect any interested party. Additionally, confidential treatment of this information is consistent with the Commission’s treatment of similar materials in Order No. 25,363, dated May 11, 2012.

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 FairPoint’s request. There is no legitimate purpose or public interest to be served in disclosing the Confidential Information to

the Company's current or future competitors or to any person other than the appropriate staff of the Commission.

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

Respectfully submitted,

NORTHLAND TELEPHONE COMPANY OF  
MAINE, INC. D/B/A FAIRPOINT  
COMMUNICATIONS

*Robert D. Meehan*

Dated: June 17, 2015

By: \_\_\_\_\_

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