

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

DT 10-\_\_\_\_\_

**Request for Waiver of NeuStar's Denial of FairPoint's Request for Numbering Resources**

.....

**MOTION FOR CONFIDENTIAL TREATMENT**

Pursuant to RSA 91-A:5, IV, RSA 378:43 and N.H. Admin. Rules Puc 203.08, Northern New England Telephone Operations LLC d/b/a FairPoint Communications - NNE ("FairPoint") hereby moves for a protective order to prevent public disclosure of the confidential and proprietary information included in the Letter and accompanying Exhibits included with the above captioned Request. In support of this Motion, FairPoint states as follows:

1. The information contained in the Letter and accompanying Exhibits consists of specific customer information and information concerning FairPoint's use of numbering resources which 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. 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.

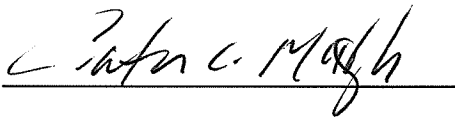
5. Due to the sensitive nature of the Confidential Information, it is appropriate for the Commission to limit access to it. The confidential Letter and accompanying Exhibits should solely be used by the Commission in exercising its governmental functions in considering FairPoint's Request. There is no 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 Letter and accompanying Exhibits requesting a waiver of NeuStar's Denial of FairPoint's Request for Numbering Resources be treated as confidential.

Respectfully submitted,

Northern New England Telephone Operations LLC

Dated: October 27, 2010

By: 

Patrick C. McHugh, Esq.

900 Elm Street – Suite 1624

Manchester, NH 03101

pmchugh@fairpoint.com