

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

MOTION FOR CONFIDENTIAL AND PROPRIETARY TREATMENT

Sprint Communications Company L.P., a subsidiary of Sprint Corporation (collectively “Sprint”),¹ hereby requests that the Public Utilities Commission (“Commission”) maintain the confidentiality of certain information filed confidentially with the Commission under cover of this Motion for Confidential and Proprietary Treatment (“Motion”). Sprint currently enjoys the privilege of being the exclusive provider of Telecommunications Relay Service (“TRS”) to the State of New Hampshire, a privilege it has held since 1991. Over six years have elapsed since Sprint last received an adjustment to its rates for TRS. In the enclosed Request for Rate Adjustment (“Request”), Sprint provides pricing details and certain factual underpinnings for Sprint’s pricing. The pricing information contained in the Request is confidential, commercial and financial information. Accordingly, the sections of the Request marked as Confidential are appropriately protected from disclosure under Section 201.04(a)(6) of the Commission’s rules, and under R.S.A. § 91-A:5 IV.

In support of this Motion, Sprint states the following.

1. The Request contains information that is not publicly available and release of such information would be competitively disadvantageous to Sprint.
2. Certain information submitted includes commercial information that derives actual and potential independent economic value from not being known to, and not being

¹ Please note that as of April 1, 2020, a transaction was completed by which Sprint Corporation (“Sprint”), the parent company of Sprint Communications Company L.P., merged into an indirect subsidiary of T-Mobile US Inc. (“T-Mobile”), with Sprint surviving as an indirect subsidiary of T-Mobile and by which Sprint Communications became an indirect wholly owned subsidiary of T-Mobile.

ascertainable via proper means by, persons who can obtain economic value from its disclosure and use.

3. The redacted information contained in the Request is only available to a limited number of persons within Sprint, and Sprint employs its best efforts to maintain its secrecy.

4. The redacted information in the Request is not made available outside the company, other than by order of a judicial or regulatory body or in the course of the discovery process in a hearing or trial, but then only to the extent that the discovery of the information is subject to a non-disclosure agreement or protective order.

5. Public disclosure of the redacted information contained in the Request would place Sprint at a competitive and economic disadvantage if released to Sprint's competitors.

6. No public policy would be served by making public information regarding Sprint's proposed pricing, business projections and proposal structure. Such information is confidential, commercial and financial information that is entitled to private and confidential treatment.

7. Given the highly competitive nature of the telecommunications industry, the confidential, commercial and financial information submitted is highly sensitive and proprietary. The release of such information to a competitor would be highly prejudicial to the conduct of Sprint's business in New Hampshire, as well as in other jurisdictions, and would place Sprint at a competitive disadvantage.

8. Release of the confidential information contained in the Request could result in an injury to competition in the market that could in turn lead to less favorable prices available to the State and its citizens.

WHEREFORE, Sprint respectfully requests that the Commission grant its Motion and maintain the confidentiality of the redacted information contained in the Request.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michelle Painter".

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