## BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

In the Matter of Qwest Corporation dba CenturyLink QC's Petition for Approval of Revisions to its Performance Assurance Plan Docket No. TC13-111

## REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION

Pursuant to ARSD 20:10:01:41, Qwest Corporation d/b/a CenturyLink QC ("CenturyLink") requests confidential treatment of information as follows:

- CenturyLink requests confidential protection and treatment of the South
  Dakota CLEC-specific payment and performance reports for the month of August 2019. The attachments are marked as "Confidential."
  - 2. The documents must be protected while in the possession of the Commission.
- 3. The person to be notified is Jason Topp, CenturyLink, 200 South Fifth Street, Room 2200, Minneapolis, MN 55402, telephone (651) 312-5364.
- 4. The claim for protection is based on ARSD 20:10:01:39 (4) and SDCL 37-29-1 (4).
- 5. The confidential documents contain information pertaining to individual and specific customers of CenturyLink QC concerning those customers' businesses.

CenturyLink QC is responsible for maintaining the confidentiality of this information. In addition, the disclosure of this information to the public would violate the confidentiality

interests of the CLEC customers themselves without their permission. All of the confidential information being submitted is viewed as highly proprietary by CenturyLink and is closely guarded to maintain its confidentiality. The data at the level of detail being submitted by CenturyLink are closely guarded by all carriers offering access services, and if CenturyLink's confidential information became available to its competitors, they could use such data to their unfair competitive advantage.

6. The documents contain proprietary business information. Disclosure of these documents will provide actual and potential competitors with information which could provide them with a unique and unfair competitive advantage. Accordingly, CenturyLink respectfully requests that the Commission grant this request for confidential protection and treatment.

Dated this 28th day of October, 2019.

QWEST CORPORATION d/b/a CENTURYLINK QC

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