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

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**IN THE MATTER OF THE FILING OF  
TELRITE CORPORATION d/b/a LIFE  
WIRELESS' PETITION FOR  
DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER  
IN THE STATE OF SOUTH DAKOTA  
FOR THE LIMITED PURPOSE OF  
PROVIDING LIFELINE SERVICE TO  
QUALIFYING CUSTOMERS**

**TC25-002**

**REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION  
CONTAINED IN TELRITE'S RESPONSES TO STAFF'S FIRST DATA REQUESTS**

Telrite Corporation d/b/a Life Wireless ("Telrite" or the "Company") hereby respectfully requests confidential treatment of certain information it is submitting to Commission Staff, pursuant to ARSD 20:10:01:41.

Certain of Staff's First Data Requests ("DRs") seek information that should be considered proprietary or trade secret under South Dakota law, and therefore Telrite's responses to those requests are being filed confidentially.

Specifically, DR 1-5 asks for Telrite's financial statements. As a privately held company, Telrite does not publicly disclose its financial statements, which contain non-public, sensitive financial data. Telrite operates in a highly competitive segment of the telecommunications industry, and public disclosure of this information would cause competitive harm by revealing information that is not otherwise available to competitors. The information responsive to DR 1-5 meets the definition of "trade secret" under SDCL § 37-29-1(4), which includes information that: "derives independent economic value, actual or potential, 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 or use and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy." Telrite has consistently treated this financial information as confidential

and does not disclose it outside the organization except on a need-to-know basis and under confidentiality protections.

DR 1-6 requests the number of Lifeline customers Telrite has in each state in which it offers service. While general Lifeline enrollment figures can be located on the USAC website, obtaining a state-by-state breakdown by provider requires significant effort. Importantly too, the Tribal customer-specific information requested is not publicly available at all. Disclosure of this granular subscriber data and number of Tribal Lifeline customers would provide competitively sensitive insights into Telrite's customer base. Telrite considers its response to DR 1-6 to be confidential and competitively sensitive and submits that it qualifies as a "trade secret" under SDCL § 37-29-1(4). Telrite therefore requests confidential treatment of this information.

DR-16 asks what percent of Telrite's customers purchase a "top up" plan. This information is not publicly disclosed and reflects internal customer behavior and purchasing trends. Telrite considers this information a "trade secret" under SDCL § 37-29-1(4) and respectfully requests confidential treatment pursuant to ARSD 20:10:01:41.01.

In closing, Telrite respectfully requests that the Commission treat its responses to DRs 1-5, 1-6 and 1-16 as confidential for a period of five years. The information is marked confidential and is being filed under seal.

Respectfully submitted,



Susan J. Berlin  
Amanda M. Calloway  
Friend, Hudak & Harris, LLP  
Three Ravinia Drive, Suite 1700  
Atlanta, GA 30346  
Phone: (770) 399-9500 Ext. 115  
Fax: (770) 395-0000  
Email: SBerlin@fh2.com

*Attorneys for Telrite Corporation d/b/a Life Wireless*

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