

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

APPLICATION OF ASSURANCE)	
WIRELESS USA, L.P., TO EXPAND ITS)	Docket No. TC25-003
ELIGIBLE TELECOMMUNICATIONS)	
CARRIER DESIGNATED SERVICE)	
AREA TO INCLUDE TRIBAL LANDS)	

**REQUEST FOR CONFIDENTIAL TREATMENT
OF ATTACHMENTS TO ASSURANCE WIRELESS'
SUBMISSION OF DOCUMENTS FROM DOCKET NO. TC24-002**

Assurance Wireless USA, L.P. (“Assurance Wireless”) hereby respectfully requests confidential treatment of certain information it is filing with the South Dakota Public Utilities Commission (“Commission”), pursuant to A.R.S.D. 20:10:01:41.

Assurance Wireless’ Petition in this docket refers to and builds on the ETC designation granted by the Commission to Assurance Wireless in the Commission’s May 15, 2024 Order in Docket No. TC24-002 (the “2024 Designation Order”). In order to ensure that the 2024 Designation Order and documents supporting it are part of the record in Docket No. TC25-003, Assurance Wireless is filing those documents, including its responses to Staff’s Data Requests, from Docket No. TC24-002 into the record in Docket No. TC25-003.

A few items from Assurance Wireless’ responses to Staff’s Data Requests in Docket No. TC24-002 were filed confidentially with the Commission, because they contained information that should be considered proprietary or trade secret under South Dakota law. Those items are Attachment 4 to Assurance Wireless’ February 2, 2024 Responses to Staff’s First Set of Data Requests (the confidential response to DR1-27) and Attachment 7 to Assurance Wireless’ March 5, 2025 Responses to Staff’s Second Set of Data Requests (the confidential response to DR2-8).

These items are Attachments G and I, respectively, to Assurance Wireless' Submission of Documents from Docket No. TC24-002.

In the first of these two items, Assurance Wireless identified the percent of its subscribers that purchase additional voice or data. Assurance Wireless considers this information to be an important trade secret and takes great pains to keep it confidential. The information in Attachment G meets the definition of "trade secret" under S.D.C.L. § 37-29-1(4) and the definition of "proprietary information" under S.D.C.L. § 1-27-28.

In the second of these two items, Assurance Wireless identified the amount of battery backup power available at T-Mobile cell tower sites in South Dakota. Assurance Wireless considers this information to be an important trade secret and takes great pains to keep it confidential. Moreover, technical information of this nature about cell tower sites is maintained as confidential for security purposes. The information in Attachment I meets the definition of "trade secret" under S.D.C.L. § 37-29-1(4) and the definition of "proprietary information" under S.D.C.L. § 1-27-28.

The information in Attachments G and I is extremely sensitive and could be used by Assurance Wireless' competitors to gain insight into Assurance's internal business operations (and in the case of Attachment I, could be used by persons seeking to disrupt communications on T-Mobile's network).. Disclosure of this information would be extremely detrimental to Assurance Wireless because it could be used by competitors to materially affect Assurance Wireless' operations and competitive position. Due to the sensitive nature of this information, it is appropriate for the Commission to limit access to it. The confidential information is being provided to the Commission to allow the Commission to exercise its governmental functions. No

legitimate purpose would be served by allowing this information to be accessible to competitors in the telecommunications industry, or to anyone other than Commission staff.

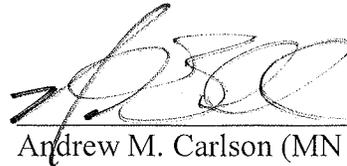
Most importantly, this information was accepted as confidentially filed when it was originally filed in Docket TC24-002. Because the Commission previously accepted the trade secret designation before for these items, it should do so again.

Assurance Wireless respectfully requests that the Commission treat Attachments G and I as confidential for a period of five years. Additional information or inquiries regarding this request may be directed to the undersigned counsel.

The information for which confidential treatment is requested is marked “CONFIDENTIAL” and is being filed under seal in separate electronic documents marked “CONFIDENTIAL.”

For the foregoing reasons, Assurance Wireless respectfully requests that the Commission treat its responses to Attachments G and I as confidential for no less than the time period specified above.

Dated this 12th day of June, 2025



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