

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

**In the Matter of the Request of Qwest
Corporation dba CenturyLink QC for
Certification Regarding Its Use of
Federal Universal Service Support**

Docket No. TC25-019

REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION

Qwest Corporation dba CenturyLink QC requests the South Dakota Public Utilities Commission (Commission) to approve confidential treatment for the below-identified information pursuant to Administrative Rules of South Dakota (ARSD) § 20:10:01:41.

1. Qwest Corporation dba CenturyLink QC (Qwest) requests confidential protection and treatment of the confidential attachment to SD-PUC-02 identifying instances in which the company experienced damage to facilities from excavators who failed to call 811. The document is marked “CONFIDENTIAL ATTACHMENT 2-1.”

2. The document must be protected for the life of this Docket. When the Docket is closed, all protected information must be returned to Qwest Corporation dba CenturyLink QC.

3. Please refer all inquiries regarding this filing to:

Jason Topp
Assistant General Counsel
State Regulatory Affairs
200 South 5th Street, Ste
2200
Minneapolis, MN 55402
(651)312-5364
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4. The claim for protection is based on ARSD § 20:10:01:39 (4) and SDCL § 37-29-1 (4). The information contained within the confidential portions of this report meets the definition of “trade secret” under the SDCL § 37-29-1(4), the South Dakota Uniform Trade Secret Act, which defines the term as information that “[d]erives 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.”

5. The factual basis that qualifies the information for confidentiality is as follows: The material noted as Confidential is confidential, proprietary business information concerning damages the company has experienced. This information meets the definition of “trade secret” under the SDCL §37-29-1(4), defined as information that “[d]erives 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.” This information also meets the definition of “proprietary information” under SDCL § 1-27-28, which is defined as “information on pricing, costs, revenue, taxes, market share, customers, and personnel held by private entities and used for that private entity’s business purposes.”

Accordingly, Qwest respectfully requests that the Commission authorize confidential protection and treatment of this information.

The information for which confidential treatment is requested has been marked “CONFIDENTIAL” and is being transmitted electronically as a separate document.

Date: July 29, 2025

Respectfully submitted,
LUMEN

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