

# Morgan Lewis

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August 5, 2025

**Via E-Filing**

Leah Mohr, Executive Director  
South Dakota Public Utilities Commission  
Capitol Building, First Floor  
500 East Capital Avenue  
Pierre, South Dakota 57501-5070

**Re: Docket No. TC25-032**  
**Application of Zayo Network Services, LLC for a Certificate of Authority to  
Provide Resold and Facilities-Based Local Exchange Telecommunications  
Services in the State of South Dakota**

**RESPONSES TO DATA REQUESTS**

Dear Director Mohr:

On behalf of Zayo Network Services, LLC ("Applicant"), please find enclosed Applicant's Responses to the data requests issued by Commission Staff in the above-referenced proceeding on July 29, 2025.

Please note that **Confidential Attachment 1** to the Responses has been redacted from the public version of the Responses and is being electronically filed with the Commission under separate cover. Applicant hereby requests confidential treatment of **Confidential Attachment 1**, which consists of a geographical map detailing the network that Applicant will initially utilize to provide service to South Dakota customers (the "Confidential Information"). Such information constitutes trade secrets or commercial information within the meaning of South Dakota Administrative Rules § 20:10:01:39(4) and South Dakota Codified Laws § 15-6-26(c)(7). Applicant requests that the Confidential Information being provided to the Commission continue to be treated as confidential before, during, and after the proceedings in the above-captioned matter.

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The Confidential Information contains information that is commercially sensitive and is not available to the general public. Unrestricted availability of the details of the Confidential Information would provide competitors with information regarding the Applicant which competitors could use to evaluate Applicant's business strategies to the Applicant's detriment. Such availability would disclose certain non-public details of the Applicant's business and could ultimately result in a competitive disadvantage to Applicant. Confidential treatment of the Confidential Information is therefore requested to avoid potential commercial injury.

Communications regarding this request for confidential treatment should be directed to Applicant's counsel below.

We would appreciate acknowledgment of receipt and acceptance of this filing. Should you have any questions concerning this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Patricia Cave

Catherine Wang  
Patricia Cave

*Counsel to Zayo Network Services, LLC*