

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

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In the Matter of	)	Docket No. FCU-2013-0007
	)	
The Complaint of Carolyn Frahm	)	(C-2013-0025)
	)	
	)	
	)	

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**WINDSTREAM’S AFFIDAVIT IN SUPPORT OF  
MOTION FOR CONFIDENTIAL TREATMENT**

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1. My name is Kristi Moody. I am the Deputy General Counsel and Assistant Secretary of Windstream Iowa Communications, Inc. ("Windstream").
2. In response to Data Requests from the Office of Consumer Advocate (“OCA”), Windstream provided OCA with confidential and proprietary documents containing Windstream’s trade secrets that Windstream designated as “Confidential” (“Confidential Information”). In accordance with Board rules and procedures, OCA has filed certain of the Confidential Information under seal with the Board.
3. The "Confidential Information includes contracts between Windstream and third party telecommunications carriers, correspondence between Windstream and the FCC, data regarding Windstream’s settlement with the FCC and compliance with the terms of the settlement agreement. The Confidential Information derives independent economic value to Windstream, is not generally known to and not readily ascertainable by proper means by Windstream’s competitors. The Confidential Information contains competitively sensitive information and is confidential and proprietary and constitutes trade secrets for Windstream.

4. Windstream has filed its Motion for Confidential Treatment of the Confidential Information seeking to protect the Confidential Information from public disclosure.

4. If released to its competitors, the Confidential Information would cause harm to Windstream's market-entry strategy and methods of doing business.

/s/ Kristi Moody  
Kristi Moody

STATE OF ARKANSAS     )  
  ) ss:  
PULASKI COUNTY         )

Subscribed and sworn to before me a Notary Public for the State of Arkansas.

/s/ Notary Public

PROOF OF SERVICE

I hereby certify that the foregoing document was automatically served electronically on all parties registered with the Electronic Filing System on: November 24, 2014.

Signature: /s/ Connie Love