

**FILED WITH
Executive Secretary**

June 19, 2015

IOWA UTILITIES BOARD

TRANSMITTAL

DATE: June 19, 2015

COMPANY NAME: Windstream Iowa Communications, Inc.

SUBJECT MATTER: Windstream's Motion for Confidential Treatment

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(C-2013-0025)

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

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In the Matter of

The Complaint of Carolyn Frahm

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Docket No. FCU-2013-0007

(C-2013-0025)

WINDSTREAM'S MOTION FOR CONFIDENTIAL TREATMENT

Windstream Iowa Communications, Inc. ("Windstream"), pursuant to Iowa Code § 22.7(3) and (6) and Iowa Administrative Code § 199-1.9(5)a(1) and (3), requests that portions of OCA's Report filed on May 26, 2015 that OCA has designated as confidential be granted confidential treatment by the Iowa Utilities Board. In support of its Motion, Windstream states as follows:

OCA's Report includes proprietary business information and trade secrets ("Confidential Information") about Windstream. The Confidential Information includes excerpts from Windstream's Compliance Manual that Windstream filed with the FCC on a confidential basis. The confidential excerpts are taken from OCA's Exhibit W-49A and discuss Windstream's procedures for its internal operations relating to completion of calls.

The Confidential Information derives independent economic value, from not being generally known to, and not being readily ascertainable by proper means by a person able to obtain economic value from its disclosure or use, and Windstream exercises reasonable care to maintain the secrecy of the Confidential Information. If released to competitors or to the public, this information could cause harm to Windstream's business operations and to those third-party vendors with which Windstream does business.

Iowa law protects from public disclosure “[t]rade secrets which are recognized and protected as such by law,” as well as “[r]eports to governmental agencies, which, if released, would give advantage to competitors and serve no public purpose.” Iowa Code § 22.7(3) and (6). Iowa Code § 550.2(4) defines “trade secret” to mean information, including but not limited to programs, devices, methods or processes.

Windstream’s Compliance Manual falls within the categories of information that Iowa law protects from public disclosure. If released, the information would give advantage to competitors and would serve no public purpose. Iowa Code § 22.7(6).

Wherefore, Windstream requests the Board to enter an order granting this Motion for Confidential Treatment and directing that the portions of OCA’s Report, filed under seal on May 26, 2015 and marked “Confidential”, be withheld from public inspection pursuant to Iowa Code §§ 22.7(3) and (6) and Iowa Administrative Code § 199-1.9(5)a(1) and (3). An affidavit of Kristi Moody in support of this motion is attached hereto.

Respectfully submitted

BELIN McCORMICK, P.C.

By /s/ Richard W. Lozier, Jr.

Richard W. Lozier, Jr.

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ATTORNEYS FOR WINDSTREAM IOWA
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PROOF OF SERVICE

I hereby certify that the foregoing document was automatically served electronically on all parties registered with the Electronic Filing System on: June 19, 2015.

Signature: /s/ Connie Love

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