

June 19, 2015

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

In the Matter of

The Complaint of Carolyn Frahm

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Docket No. FCU-2013-0007

(C-2013-0025)

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

1. My name is Kristi Moody. I am the Deputy General Counsel and Assistant Secretary of Windstream Iowa Communications, Inc. ("Windstream").

2. OCA's Report filed in this matter on May 26, 2015 contains confidential and proprietary information that Windstream designated as "Confidential" ("Confidential Information").

3. The "Confidential Information" includes excerpts from Windstream's Compliance Manual that it filed on a confidential basis with the FCC describing Windstream's procedures regarding completion of calls. 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 or the public. The Confidential Information contains competitively sensitive information and is confidential and proprietary and constitutes trade secrets for Windstream.

4. Windstream is filing 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 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 June 19, 2015.

Signature: /s/ Connie Love

[W0831\0007\Aff re Conf Treatment 061715 \(02168894\)](#)