

STATE OF IOWA
DEPARTMENT OF COMMERCE
IOWA UTILITIES BOARD

IN RE:	DOCKET NO. NOI-2019-0001
INQUIRY INTO REGULATORY REQUIREMENTS FOR ALTERNATIVE OPERATOR SERVICES COMPANIES	APPLICATION FOR CONFIDENTIAL TREATMENT OF SECURUS TECHNOLOGIES, INC.

Securus Technologies, Inc. (“Securus”) hereby requests that the Iowa Utilities Board (“Board”) hold as confidential certain information contained in its Response to Order Initiating Inquiry (“Response”) filed September 18, 2019. Specifically, pursuant to 199 IAC 1.9(6) and Iowa Code section 22.7(3) and (6), Securus requests confidential treatment of the information in the Response provided in responding to the second question posed by the Board in the Order Initiating Inquiry dated August 20, 2019.

In support of this application for confidential treatment, Securus states as follows:

1. Securus filed the Response, which contains confidential, proprietary information that should be protected from disclosure to the public, to assist the Board in this proceeding.
2. The Response contains trade secret information, as defined in Iowa Code section 550.2(4), the public disclosure of which would give advantage to Securus’ competitors while serving no public purpose, and which need not be released to the public pursuant to Iowa Code section 22.7(3). The information provided will also benefit the Board because it is information the Board requested, and its protection facilitates private parties’ willingness to participate and provide such information, consistent with the purpose of the protection afforded to information provided to the Board under Iowa Code section 22.7(6).

3. Securus has filed two copies of the Response, including a public version and a confidential version, as required in 199 IAC 1.9(6) and 199 IAC 14.12.
4. The public version of the Response has been redacted to remove confidential information. The public version of the Response is named “Response of Securus Technologies – Public,” as required by 199 IAC 14.12.
5. The confidential version of the Response has been labeled confidential on each page, and confidential information within the document is highlighted or otherwise distinguished as required by 199 IAC 14.12. The confidential version of the Response is named “Response of Securus Technologies – Confidential” as required by 199 IAC 14.12.
7. Securus also filed an affidavit in support of this application for confidential treatment as required by 199 IAC 1.9(6).

WHEREFORE, Securus respectfully requests that the Board approve this application for confidential treatment and hold confidential the version of the Response so marked.

Respectfully submitted this 19th day of September, 2019.

By: /s/ Kristy Dahl Rogers

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**ATTORNEYS FOR SECURUS
TECHNOLOGIES, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 19th day of September, 2019, she electronically filed the foregoing document with the Iowa Utilities Board using the EFS system which will send electronic notification of such filing to the appropriate persons.

/s/ Olivia Lucas _____

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