

A. Identification of Document or Information.

Materials containing competitively sensitive information.

1. **CONFIDENTIAL EXHIBIT CCI-GW-1:** Potential Operating Methods Improvements;
2. **CONFIDENTIAL EXHIBIT CCI-MJS-5** and portions of the **April 24, 2017 Rebuttal Testimony of Michael Shultz** containing proprietary and confidential information related to the Joint Petitioners' systems inventories, and Consolidated's projected synergy and prior due diligence;
3. **CONFIDENTIAL Attachment DPS.CC.1-3.5:** 2007 Credit Agreement;
4. **CONFIDENTIAL Attachment DPS.CC.1-13:** Consolidated Cost Allocation Manual;
5. **CONFIDENTIAL Attachment DPS.CC.1-20:** Consolidated Current Department Organizational Charts;
6. **CONFIDENTIAL Attachment DPS.CC.1-34:** Customer Complaint Reports;
7. **CONFIDENTIAL Attachment DPS.CC.1-39:** Outside Plant Engineering Guidelines;
8. **CONFIDENTIAL Attachment DPS.CC.1-61:** Consolidated Technology Usage Policy;
9. **CONFIDENTIAL Attachments DPS.CC.1-69.1, 1-69.2, and 1-69.3:** Service Quality Reports filed by Consolidated;
10. **CONFIDENTIAL Attachment DPS.CC.2-13:** compilation of "Go/No-Go" emails from the recent SureWest communications B/OSS migration;
11. **CONFIDENTIAL Attachment DPS.CC.2-16:** a breakdown of the current Consolidated workforce by position, function and State, with indication of union/non-union status;
12. **CONFIDENTIAL Attachment DPS.CC.2-31:** Consolidated's anticipated amount of revenue from CLEC's in Vermont; and
13. **CONFIDENTIAL Attachment Labor.CC.1-10:** chart indicating marketable addresses by technology.

B. Degree of Confidential Information.

This material includes recent and specific Consolidated proprietary manuals and guidelines, complaints, and organizational information, all of which is competitively sensitive information. This material has not been made public, as set forth below.

This information is highly sensitive in the competitive marketplace Consolidated operates in. The organization chart, above-referenced manual and guidelines contain information developed using Consolidated systems and personnel. The

public disclosure of this information could be detrimental to Consolidated's business, because competitors could use the information to more effectively market their service to Consolidated customers. Public disclosure would permit competitors to better create business strategies designed to retain existing customers or attract new customers.

As well, the customer complaint reports are not public information that competitors could use to compete more effectively against Consolidated through direct marketing and sales strategies informed by this otherwise unavailable information.

C. Confidentiality Factors.

i. Extent Information Known Outside Company

This confidential information is known only by certain Consolidated personnel as well as the authorized recipients of these materials under confidentiality agreements.

ii. Extent Information Known by Employees and Independent Contractors

This information is known only to certain Consolidated personnel and its legal advisors.

iii. Measures Taken to Guard Security

This information is maintained by Consolidated in restricted access computer files and in secure files.

iv. Value of Information to Company and Competitors

The information is competitively sensitive and contains information, the disclosure of which would impact Consolidated's bargaining position in any number of situations.

v. Amount of Money or Effort to Develop Information

This information was developed by Consolidated's executive personnel at its own time and expense, based on its familiarity, experience, training, and expertise in the industry. Consolidated has incurred material costs developing the above listed confidential Attachments and Exhibits. That work as well as the value of the underlying transaction itself are at risk in the event of disclosure of this confidential information.

vi. Cost/Difficulty in Acquiring/Duplicating Information

See C.v.

vii. Harm of Disclosure

See B and C.iv.

D. Time Period

The information should be kept confidential until at least 2022.

E. Partial Disclosure or Redaction

Mr. Shultz has redacted limited portions of his testimony that discuss or divulge (1) information contained in his confidential exhibit, (2) Joint Petitioners' systems inventories, or (3) Consolidated's projected synergy. All other information and testimony have been made public to the fullest extent possible. The confidential information in the discovery materials appears throughout the confidential documents, and thus, redacted versions cannot be prepared.

F. Other Factors

None.