

Confidential Documents and Information

June 12, 2019

A. Identification of Document or Information.

Materials containing competitively sensitive information.

1. **Confidential Attachments DPS.CC.1-2.1 through 1-2.18:** Spreadsheet detailing customer trouble tickets for an 18 month period, including customer and location specific information, serving wire center and cause of trouble;
2. **Confidential Attachments DPS.CC.1-5.1 through 1-5.18:** Spreadsheet detailing customer trouble tickets for an 18 month period, including customer and location specific information, time repair trouble, and cause of trouble;
3. **Confidential Attachments DPS.CC.1-6.1 through 1-6.36:** Spreadsheet detailing trouble tickets for an 18 month period, including customer and location specific information, serving wire center, time repair trouble, and cause of trouble;
4. **Confidential Attachment DPS.CC.1-7:** Spreadsheet detailing the amount of customer credits provided and customer contact information;
5. **Confidential Attachment DPS.CC.1-8:** Spreadsheet detailing the amount of customer credits provided and customer contact information;
6. **Confidential Attachment DPS.CC.1-9:** Detailed spreadsheet regarding out-of-service conditions for an 18-month period, including specific transport information and technology utilized by the Company;
7. **Confidential Attachment DPS.CC.1-11:** Information regarding staffing levels by Consolidated and predecessor from January 1, 2016 to October 1, 2018;
8. **Confidential Attachment DPS.CC.1-12:** Information regarding staffing levels by Consolidated at present in Vermont, also handling regulated services in New Hampshire and Maine;
9. **Confidential Attachments DPS.CC.1-13.1 through 1-13.2:** Information regarding Consolidated internal practices on financing reporting of regulated services, tracking, dispatch priority, and confidential information on capital and expense expenditures in multiple states;

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10. **Confidential Attachment DPS.CC.1-14:** Spreadsheet detailing by wire center all network troubles, access lines, and the network trouble report rate;
11. **Confidential Attachment DPS.CC.1-15.1:** Consolidated proprietary repair resolution flow process documentation;
12. **Confidential Attachment DPS.CC.1-15.2:** Consolidated proprietary and internal training guide and testing process for mechanized loop test;
13. **Confidential Attachments DPS.CC.1-16.1 through 1-16.3:** Consolidated proprietary information regarding its internal processing of customer requests for installation of new service;
14. **Confidential Attachments DPS.CC.1-17.1 and 1-17.2:** Consolidated proprietary information regarding its internal process of installation and repair of POTS service, including the process for closing out service tickets;
15. **Confidential Attachment DPS.CC.1-18:** Consolidated proprietary information regarding its internal and customized process for addressing troubles;
16. **Confidential Attachment DPS.CC.1-19:** Consolidated proprietary information regarding its internal and customized process for maintaining customer accounts;
17. **Confidential Attachment DPS.CC.1-20.1:** Consolidated propriety 2018 performance assessment guidelines detailing its internal process for compliance with PUC Rule 7.611;
18. **Confidential Attachment DPS.CC.1-21.1:** Summarizes for an 18 month period all line extension requests and completion timing;
19. **Confidential Attachment DPS.CC.1-21.2:** Consolidated proprietary internal process for processing line extension requests;
20. **Confidential Attachment DPS.CC.1-22:** Summarizes for an 18 month period line replacements for each individual serving type;

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21. **Confidential Attachment DPS.CC.1-31:** Summarizes Consolidated's merger commitment reinvestment data for the State of Vermont in 2018;
22. **Confidential Attachment DPS.CC.1-34:** Information regarding total number of customers each month out of service for over 24 hours;
23. **Confidential Attachment DPS.CC.1-35:** Information relating to actions taken by Consolidated to improve customer repair times, which includes information related to proprietary, internal processes and confidential information related to the collective bargaining negotiation;
24. **Confidential Attachment DPS.CC.1-38:** Consolidated propriety and internal process for routing and responding to customer service inquiries, including current and historical staffing information;
25. **Confidential Attachment DPS.CC.1-40:** Consolidated propriety and internal process which Consolidated technicians utilize for completing service and repair orders;
26. **Confidential Attachment DPS.CC.1-45:** Information regarding the percentage of unmet repair times;
27. **Confidential Attachment DPS.CC.1-49:** Information regarding the average number of days for service outage repairs after a missed appointment date;
28. **Confidential Attachment DPS.CC.1-50:** Information regarding the average number of days for new service installations after a missed appointment date;
29. **Confidential Attachment DPS.CC.1-51 and Revised Confidential Attachment DPS.CC.1-51:** Information regarding the average length of time to install new service for a residential customer;
30. **Confidential Attachment DPS.CC.1-52:** Information regarding the percentage of outage repairs completed within various time periods;
31. **Confidential Attachment DPS.CC.1-53:** Information regarding the rescheduled appointments;

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32. **Confidential Attachment DPS.CC.1-56:** Consolidated propriety and internal process for logging customer calls to customer service.
33. **Confidential Attachment DPS.CC.2-1.1:** Consolidated proprietary information regarding its internal and customized process and codes for addressing troubles;
34. **Confidential Attachment DPS.CC.2-1.2:** Consolidated proprietary information regarding its internal and customized process and codes for addressing troubles;
35. **Confidential Attachment DPS.CC.2-3:** Information detailing the amount of customer credits provided;
36. **Confidential Attachment DPS.CC.2-4:** Information detailing the amount of customer credits provided;
37. **Confidential Attachment DPS.CC.2-5:** Information detailing the amount of customer credits provided and proprietary information regarding credit issuance criteria;
38. **Confidential Attachment DPS.CC.2-6:** Information detailing the amount of customer credits provided and proprietary information regarding credit issuance criteria;
39. **Confidential Attachment DPS.CC.2-7:** : Information detailing the amount of customer credits provided;
40. **Confidential Attachment DPS.CC.2-8:** : Information detailing the amount of customer credits provided;
41. **Confidential Attachment DPS.CC.2-9:** Information detailing the amount of customer credits provided and proprietary information regarding credit issuance criteria;
42. **CONFIDENTIAL Attachment DPS.CC.2-10:** Draft Annual Report, which contains detailed expense, revenue, and access line information.
43. **Confidential Attachment DPS.CC.2-12:** Consolidated propriety and internal process which Consolidated utilizes for assesses whether an event has the potential to affect customers;

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44. **Confidential Attachment DPS.CC.2-14:** Detailed and location specific information regarding costs, fiber and wire center locations and service lines;
45. **Confidential Attachment DPS.CC.2-15:** Detailed and location specific information regarding costs, fiber and wire center locations, service lines and completion date timing information;
46. **Confidential Attachment DPS.CC.2-16:** Detailed and location specific information regarding costs, fiber and wire center locations, service lines and completion date timing information;
47. **Confidential Attachment DPS.CC.2-24:** Detailed information regarding staffing levels by Consolidated at present in Vermont, and also handling regulated services in New Hampshire;
48. **CONFIDENTIAL Attachment DPS.CC.2-24.B:** Detailed information regarding staffing levels by Consolidated at present in Vermont, and also handling regulated services in New Hampshire;
49. **Confidential Attachment DPS.CC.2-25:** Detailed information regarding staffing levels by Consolidated at present in Vermont, and also handling regulated services in New Hampshire;
50. **Confidential Attachment DPS.CC.2-30:** Consolidated proprietary information regarding its internal processing of customer requests regarding installation of new service;
51. **Confidential Attachment DPS.CC.2-36:** Information regarding the duration of days for new service installations after request is made;
52. **Confidential Attachment DPS.CC.2-37:** Information regarding the duration of days for new service installations after request is made;
53. **Confidential Attachment DPS.CC.2-38:** Consolidated propriety and internal process which Consolidated utilizes to determine status of Consolidated facilities and communicates to customers regarding the same;

54. **Confidential Attachment DPS.CC.2-40:** Information regarding the duration of days for new service installations after request is made;
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56. **Confidential Attachment DPS.CC.2-43:** Information regarding Consolidated internal practices on technician work assignments;
57. **Confidential Attachment DPS.CC.2-44:** Information regarding the specific dates for unmet repair times;
58. **Confidential Attachment DPS.CC.2-46:** Consolidated proprietary information regarding its internal processing of notifying customer regarding service appointments;
59. **CONFIDENTIAL Attachments DPS.CC.2-47.1 and 2-47.2:** Information regarding the average number of days service outage repairs and installations were delayed.
60. **Confidential Attachment DPS.CC.2-48:** Detailed information regarding the outage repairs completed within various time periods;
61. **Revised Confidential Attachment DPS.CC.2-49:** Detailed information regarding repeat repair appointments;
62. **Confidential Attachment DPS.CC.2-50:** Consolidated proprietary information regarding its internal, technical capabilities related to service outages;
63. **CONFIDENTIAL Attachment DPS.CC.2-50.B:** Consolidated proprietary information regarding its internal, technical capabilities related to service outages;
64. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-1:** Information regarding Confidential Attachment DPS.CC.1-6 and Confidential Attachment DPS.CC.1-7;

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65. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-2:** Information regarding Confidential Attachment DPS.CC.1-6 and Confidential Attachment DPS.CC.1-7;
66. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-3:** Information regarding Confidential Attachment DPS.CC.1-9;
67. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-4:** Information regarding Confidential Attachment DPS.CC.1-9;
68. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-5:** Information regarding Confidential Attachment DPS.CC.1-9;
69. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-6, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-6:** Information regarding Confidential Attachment DPS.CC.1-9;
70. **CONFIDENTIAL QUESTION AND Supplemental ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-7, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-7:** Information regarding Confidential Attachment DPS.CC.1-9;
71. **CONFIDENTIAL QUESTION AND Supplemental ANSWER to DPS Confidential Second Set of Confidential Discovery, CONFIDENTIAL.DPS.CC.2-8:** Information regarding Confidential Attachment DPS.CC.1-13.1;
72. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-9:** Information regarding Confidential Attachment DPS.CC.1-13.2;
73. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-10:** Information regarding Confidential Attachment DPS.CC.1-13.2;

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74. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-11, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-11:**
Information regarding Confidential Attachment DPS.CC.1-22;
75. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-12, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-12:**
Information regarding Confidential Attachment DPS.CC.1-31;
76. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-13:**
Information regarding Confidential Attachment DPS.CC.1-35;
77. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-14, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-14:**
Information regarding Confidential Attachment DPS.CC.1-35;
78. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-15:**
Information regarding Confidential Attachment DPS.CC.1-35;
79. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-16, and Confidential Attachments DPS.CC.CONFIDENTIAL.2-16.1 and 2-16.2:** Information regarding Confidential Attachment DPS.CC.1-35;
80. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-17:**
Information regarding Confidential Attachment DPS.CC.1-35;
81. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-18:**
Information regarding Confidential Attachment DPS.CC.1-35;
82. **CONFIDENTIAL QUESTION AND Supplemental ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-19 and Confidential Attachment DPS.CC.CONFIDENTIAL.2-19:** Information regarding Confidential Attachment DPS.CC.1-35;

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83. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-20:** Information regarding Confidential Attachment DPS.CC.1-6;
84. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-21, and Confidential Attachments DPS.CC.CONFIDENTIAL.2-21.1 through 2-21.18:** Information regarding Confidential Attachment DPS.CC.1-5;
85. **CONFIDENTIAL Attachment DPS.CC.2-21.Supplemental question.1 and CONFIDENTIAL Attachment DPS.CC.2-21.Supplemental question.2 :** Information including Spreadsheet detailing and combining repairs, orders and staffing levels; and
86. **Portions of the Direct Testimony of Michael Shultz:** Pricing, revenue and cost figures for services, and specific town related information.

B. Degree of Confidential Information.

DESCRIPTION

This material includes recent and specific data involving competitively sensitive information. Among other things, it includes descriptions of (1) Consolidated's internal and proprietary policies and procedures relating to customer service queries, customer accounts, processing work orders, repairs, trouble reports/tickets, new service, line extensions, and compliance obligations; (2) internal training and testing procedures for automated testing; (3) outage processing protocols; (4) detailed trouble ticket data including repair times, wire service centers and trouble codes; (5) detailed data on installation appointments timing; (6) data on customer credit amounts; (7) confidential information on current and historical staffing levels; (8) confidential information related to the labor union contract; (9) confidential data on Consolidated capital expenditures and specific details on plant upgrades; and (10) pricing, revenue and cost figures for services, and information related to services in specific towns. This material has not been made public, as set forth below.

BASIS FOR CONFIDENTIALITY

Some of this material includes confidential customer identifying information which is both competitively sensitive as well as subject to relevant statutory and regulatory confidentiality provisions, including 47 C.F.R. Subpart U (CPNI).

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This information is proprietary for at least two reasons:

- (1) First, this information would allow competitors to compete more effectively against Consolidated through direct marketing and sales strategies informed by proprietary Consolidated business information. In particular, disclosure of detailed information about Consolidated's trouble ticket repair times, repair trends and timing, location-specific trouble ticket trends, as well as details regarding new service installation process and timing would harm Consolidated because this particularized information would enable competitors to directly target areas of the state that experience more trouble tickets than others, or specifically cater promotional materials by using this information to identify areas and types of customers that are or may be sympathetic to a competitor's position. As well, detailed information about Consolidated's capital spending and otherwise could be used by competitors through marketing and sales strategies to target customers in particular areas of the state. Similarly, disclosure of information concerning Consolidated's number and location of service technicians and other personnel would put Consolidated at a competitive disadvantage because competitors could use this information to undercut Consolidated services or shift their own priorities to gain a more competitive position.
- (2) Second, it would enable competitors to replicate Consolidated's customer service, maintenance, and technical performance systems and make their own systems more competitive. In both cases, disclosure of this information would enhance competitors' ability to adjust their own business strategies to compete against Consolidated by means of unfair advantage. Some of the information is also subject to relevant statutory and regulatory confidentiality provisions, including 47 C.F.R. Subpart U (CPNI).

C. Confidentiality Factors.

i. Extent Information Known Outside Company.

This information is not known outside of Consolidated other than to contractors and government agencies on a need to know basis and subject to an obligation of confidentiality.

ii. Extent Information Known by Employees and Independent Contractors.

This information is known to Employees on an as-needed basis, and subject to an obligation of confidentiality. As to Independent Contractors, see above response to part (i).

iii. Measures Taken to Guard Security.

This information is closely held by Consolidated, maintained for the most part on password protected computer systems, and is available to individuals in the customer service, billing, maintenance, network services, information technology and legal departments on a need-to-know basis. In addition, this information is available to legal and management personnel in connection with responding to these discovery requests.

iv. Value of Information to Company and Competitors.

This information, if disclosed to competitors, would permit competing carriers to make competitive assessments regarding Consolidated's marketing, sales and customer service strategies, its data management and technical systems, and its capacity to address customer service inquiries, thereby enhancing their ability to compete against Consolidated. Disclosure would also enable competitors to target geographic areas or types of customers that are or may be sympathetic to a competitor's position. This information has not previously been disclosed publicly.

v. Amount of Money or Effort to Develop Information.

The cost to develop this information is unknown.

vi. Cost/Difficulty in Acquiring/Duplicating Information.

See above response to part (v).

vii. Harm of Disclosure.

See above response to part (iv).

D. Time Period

This information relates to ongoing Consolidated business operations and should therefore be kept confidential indefinitely.

E. Partial Disclosure or Redaction

Subject to further review.

F. Other Factors

None.

A. Identification of Document or Information.

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67. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-4:** Information regarding Confidential Attachment DPS.CC.1-9;
68. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-5:** Information regarding Confidential Attachment DPS.CC.1-9;
69. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-6, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-6:** Information regarding Confidential Attachment DPS.CC.1-9;
70. **CONFIDENTIAL QUESTION AND Supplemental ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-7, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-7:** Information regarding Confidential Attachment DPS.CC.1-9;
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72. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-9:** Information regarding Confidential Attachment DPS.CC.1-13.2;
73. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-10:** Information regarding Confidential Attachment DPS.CC.1-13.2;

74. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-11, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-11:** Information regarding Confidential Attachment DPS.CC.1-22;
75. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-12, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-12:** Information regarding Confidential Attachment DPS.CC.1-31;
76. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-13:** Information regarding Confidential Attachment DPS.CC.1-35;
77. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-14, and Confidential Attachment DPS.CC.CONFIDENTIAL.2-14:** Information regarding Confidential Attachment DPS.CC.1-35;
78. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-15:** Information regarding Confidential Attachment DPS.CC.1-35;
79. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-16, and Confidential Attachments DPS.CC.CONFIDENTIAL.2-16.1 and 2-16.2:** Information regarding Confidential Attachment DPS.CC.1-35;
80. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-17:** Information regarding Confidential Attachment DPS.CC.1-35;
81. **CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-18:** Information regarding Confidential Attachment DPS.CC.1-35;
82. **CONFIDENTIAL QUESTION AND Supplemental ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-19 and Confidential Attachment DPS.CC.CONFIDENTIAL.2-19:** Information regarding Confidential Attachment DPS.CC.1-35;

- 83. CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-20:**
Information regarding Confidential Attachment DPS.CC.1-6;
- 84. CONFIDENTIAL QUESTION AND ANSWER to DPS Confidential Second Set of Discovery, CONFIDENTIAL.DPS.CC.2-21, and Confidential Attachments DPS.CC.CONFIDENTIAL.2-21.1 through 2-21.18:** Information regarding Confidential Attachment DPS.CC.1-5;
and
- 85. CONFIDENTIAL Attachment DPS.CC.2-21.Supplemental question.1 and CONFIDENTIAL Attachment DPS.CC.2-21.Supplemental question.2 :** Information including Spreadsheet detailing and combining repairs, orders and staffing levels; and-
- 85.86. Portions of the Direct Testimony of Michael Shultz: Pricing, revenue and cost figures for services, and specific town related information.**

B. Degree of Confidential Information.

DESCRIPTION

This material includes recent and specific data involving competitively sensitive information. Among other things, it includes descriptions of (1) Consolidated's internal and proprietary policies and procedures relating to customer service queries, customer accounts, processing work orders, repairs, trouble reports/tickets, new service, line extensions, and compliance obligations; (2) internal training and testing procedures for automated testing; (3) outage processing protocols; (4) detailed trouble ticket data including repair times, wire service centers and trouble codes; (5) detailed data on installation appointments timing; (6) data on customer credit amounts; (7) confidential information on current and historical staffing levels; (8) confidential information related to the labor union contract; (9) confidential data on Consolidated capital expenditures and specific details on plant upgrades; and (10) pricing, revenue and cost figures for services, and information related to services in specific towns. This material has not been made public, as set forth below.

BASIS FOR CONFIDENTIALITY

Some of this material includes confidential customer identifying information which is both competitively sensitive as well as subject to relevant statutory and regulatory confidentiality provisions, including 47 C.F.R. Subpart U (CPNI).

This information is proprietary for at least two reasons:

- (1) First, this information would allow competitors to compete more effectively against Consolidated through direct marketing and sales strategies informed by proprietary Consolidated business information. In particular, disclosure of detailed information about Consolidated's trouble ticket repair times, repair trends and timing, location-specific trouble ticket trends, as well as details regarding new service installation process and timing would harm Consolidated because this particularized information would enable competitors to directly target areas of the state that experience more trouble tickets than others, or specifically cater promotional materials by using this information to identify areas and types of customers that are or may be sympathetic to a competitor's position. As well, detailed information about Consolidated's capital spending and otherwise could be used by competitors through marketing and sales strategies to target customers in particular areas of the state. Similarly, disclosure of information concerning Consolidated's number and location of service technicians and other personnel would put Consolidated at a competitive disadvantage because competitors could use this information to undercut Consolidated services or shift their own priorities to gain a more competitive position.
- (2) Second, it would enable competitors to replicate Consolidated's customer service, maintenance, and technical performance systems and make their own systems more competitive. In both cases, disclosure of this information would enhance competitors' ability to adjust their own business strategies to compete against Consolidated by means of unfair advantage. Some of the information is also subject to relevant statutory and regulatory confidentiality provisions, including 47 C.F.R. Subpart U (CPNI).

C. Confidentiality Factors.

i. Extent Information Known Outside Company.

This information is not known outside of Consolidated other than to contractors and government agencies on a need to know basis and subject to an obligation of confidentiality.

ii. Extent Information Known by Employees and Independent Contractors.

This information is known to Employees on an as-needed basis, and subject to an obligation of confidentiality. As to Independent Contractors, see above response to part (i).

iii. Measures Taken to Guard Security.

This information is closely held by Consolidated, maintained for the most part on password protected computer systems, and is available to individuals in the customer service, billing, maintenance, network services, information technology and legal departments on a need-to-know basis. In addition, this information is available to legal and management personnel in connection with responding to these discovery requests.

iv. Value of Information to Company and Competitors.

This information, if disclosed to competitors, would permit competing carriers to make competitive assessments regarding Consolidated's marketing, sales and customer service strategies, its data management and technical systems, and its capacity to address customer service inquiries, thereby enhancing their ability to compete against Consolidated. Disclosure would also enable competitors to target geographic areas or types of customers that are or may be sympathetic to a competitor's position. This information has not previously been disclosed publicly.

v. Amount of Money or Effort to Develop Information.

The cost to develop this information is unknown.

vi. Cost/Difficulty in Acquiring/Duplicating Information.

See above response to part (v).

vii. Harm of Disclosure.

See above response to part (iv).

D. Time Period

This information relates to ongoing Consolidated business operations and should therefore be kept confidential indefinitely.

E. Partial Disclosure or Redaction

Subject to further review.

F. Other Factors

None.