

Confidential Documents and Information

January 21, 2022

A. Identification of Document or Information.

Materials containing competitively sensitive information.

1. **Confidential Attachment DPS.CC.1.11:** List of bundled services for residential customers, including discrete service components;
2. **Confidential Attachment DPS.CC.1.13(a):** Information on Consolidated's Service Quality performance since Consolidated acquired FairPoint in 2017 through end of year 2018;
3. **Confidential Attachment DPS.CC.1.13(b):** Information showing the estimated monthly performance for the troubles cleared in less than 48 hours from 2019 to present;
4. **Confidential Attachment DPS.CC.1.15:** Spreadsheet which shows the areas that are currently in the Consolidated fiber build plan;
5. **Confidential Attachment DPS.CC.1.22:** Spreadsheet showing proposed investment budgets by locations in Vermont for which Consolidated will receive RDOF funds;
6. **Confidential Attachment DPS.CC.1.24(a):** Spreadsheet listing all local voice service customers of Consolidated Communications of Vermont Company, LLC in Vermont;
7. **Confidential Attachment DPS.CC.1.24(b):** Spreadsheet listing all local voice service customers of Consolidated Communications Northland Company in Vermont;
8. **Confidential Attachment DPS.CC.1.25:** Information regarding employee headcounts for various positions;
9. **Confidential Attachment DPS.CC.1.27(a):** Consolidated internal service quality reports;
10. **Confidential Attachment DPS.CC.1.27(b):** Consolidated internal service quality reports;
11. **Confidential Attachment DPS.CC.1.29(a):** 2018 investment report;
12. **Confidential Attachment DPS.CC.1.29(b):** 2019 investment report;
13. **Confidential Attachment DPS.CC.1.29(c):** 2020 investment report;
14. **Confidential Attachment DPS.CC.1.34:** Information related to customer complaints in Vermont from 2015-2021; and
15. **Confidential Attachment DPS.CC.1.35:** Complaints from Consolidated Vermont customers to various agencies.
16. **Portions of the Prefiled Direct Testimony of Department of Public Service witnesses Carol Flint and August Ankum:** a) details of how many and in what specific towns Consolidated has BLES subscribers, b) details of Consolidated's total number of telephone service lines from 2018-2021, and c) specific non-public customer complaint information.

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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) all voice services, including components; (2) detailed and non-public service quality information; (3) confidential information on staffing levels; (4) fiber build plans; (5) budgets and investment data; (6) confidential data on customer complaints, (7) detailed location specific information as to where customer subscribers are located by town, and (8) total number of telephone service lines 2018-2021. This material has not been made public, as set forth below.

BASIS FOR CONFIDENTIALITY

This information is proprietary and competitively sensitive for at least these reasons:

This confidential information identified above 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 services, fiber build plans, customer locations by town, number of telephone lines, and budget and investment details, and consumer complaints 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 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.

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., Ch. 1, Subchapter B, Part 64, Subpart U (CPNI).

C. Confidentiality Factors.

i. Extent Information Known Outside Company.

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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 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 for the next five years.
- E. Partial Disclosure or Redaction**
Subject to further review.

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F. Other Factors
None.