

CONFIDENTIAL – NOT FOR PUBLIC INSPECTION

June 26, 2015

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743

Re: Request for Confidential Treatment

Dear Ms. Dortch:

TDS Telecommunications Corporation on behalf of its filing affiliates listed on Attachment 1 (the "Company"), pursuant to 47 C.F.R. §§ 0.457, 0.459, hereby requests that portions of its filing as required by 47 C.F.R. § 54.313 and 47 C.F.R. § 54.422 ("Form 481 Filing") be treated as confidential and not subject to public inspection. Certain portions of the Form 481 Filing as identified further below contain confidential and proprietary information that, if subject to public disclosure, would cause significant commercial and competitive harm to the Company. As described below, the Company's request satisfies the standards for grant of this request as set forth in Sections 0.457 and 0.459 of the Commission's Rules.

Outage reporting required by 54.313 including the location, cause, duration of an outage; efforts taken to prevent future outages is confidential and proprietary to the Company under 47 C.F.R. § 0.457(d).

In accordance with Section 0.459(b) and in support of its request, the Company provides the following information:

(1) <u>Identification of Confidential Materials</u>: The Company seeks confidential treatment of outage reporting information including the location, cause, duration of an outage; efforts taken to prevent future outages; information regarding unfulfilled service requests; consumer complaint information; portions of the Company's five year service quality improvement plan; and information identifying anchor customers. The Company requests that this information contained in the Form 481 Filing be treated on a confidential basis under Exemption 4 of the Freedom of Information Act.

The confidential information has been redacted from the public version with black shading, indicating where confidential information was redacted and the public version has been filed using the Commission's Electronic Comment Filing System.

(2) <u>Circumstances Giving Rise to Submission of Information</u>: The Company files the Form 481 Filing as required by Commission rules 47 C.F.R. § 54.313 and 47 C.F.R. § 54.422.

CONFIDENTIAL – NOT FOR PUBLIC INSPECTION

- (3) <u>Degree to Which Information is Commercial, Financial, or Contains Trade Secret or is Privileged</u>: The information in question is competitively sensitive information which is not normally released to the public, as such release would have a substantial negative impact on the Company.
- (4) <u>Degree to Which the Information Concerns a Service Subject to Competition</u>: The Company competes with cable operators and wireless carriers and the information in question relates to services subject to competition.
- (5) <u>How Disclosure Could Result in Substantial Harm</u>: Disclosure of the Company's confidential and proprietary information would give its competitors a significant advantage by revealing sensitive business information regarding the operation of the Company's business at a level of detail not currently available to the public.
- (6) <u>Measures Taken to Prevent Disclosure</u>: The Company maintains the confidential information in Form 481 as confidential and does not permit access to such information to any persons other than employees who require access to this information for the specific purpose of conducting business on behalf of the Company.
- (7) <u>Public Access to Information, Third Party Disclosure</u>: The Company has not made this information publicly available through any previous disclosures.
- (8) <u>Justification of the Period During Which the Material Should Not be Publicly Available</u>: The Company requests that the Commission hold this information out of public view, and cannot determine at this time any date on which this information should not be considered confidential.
- (9) <u>Additional Information</u>: The information in question may also be confidential in accordance with protective orders of the Commission including the Commission's Third Protective Order in Docket WC 10-90. <u>In re. Connect America Fund</u>, 27 FCC Rcd. 10276 (2012)

Please contact the undersigned should you have any questions concerning the Company's request for confidentiality pursuant to the Commission's rules

Sincerely yours,

Sara Cole

Regulatory Counsel

TDS Telecommunications Corp.

(608) 664-8140

CONFIDENTIAL – NOT FOR PUBLIC INSPECTION

Attachment 1

		Attachment 1
State	Study Area Name	SAC
AL	Butler Telephone Company	250284
AL	Oakman Telephone Company, Inc.	250311
AL	Peoples Telephone Company, Inc.	250314
AR	Cleveland County Telephone Company, Inc.	401698
AR	Decatur Telephone Company	401699
AZ	Arizona Telephone Company	452171
AZ	Southwestern Telephone Company	452174
CA	Happy Valley Telephone Company	542321
CA	Hornitos Telephone Company	542322
CA	Winterhaven Telephone Company	542323
CO	Delta County Tele-Comm, Inc.	462184
CO	Strasburg Telephone Company	462207
FL	Quincy Telephone Company, FL	210338
GA	Blue Ridge Telephone Company	220346
GA	Camden Telephone & Telegraph Company, Inc.	220351
GA	Nelson-Ball Ground Telephone Company	220375
GA	Quincy Telephone Company, GA	220338
ID	Potlatch Telephone Company	472230
IN	Camden Telephone Company, Inc.	320744
IN	Communications Corporation of Indiana	320776
IN	Communications Corporation of Southern Indiana	320809
IN	Home Telephone Company, Inc. (IN)	320778
IN	S&W Telephone Company, Inc.	320816
IN	The Home Telephone Company of Pittsboro, Inc.	320777
IN	The Merchants and Farmers Telephone Company	320788
IN	Tipton Telephone Company, Inc.	320829
IN	Tri-County Telephone Company, Inc.	320830
IN	West Point Telephone Company, Incorporated	320837
KY	Leslie County Telephone Company	260411
KY	Lewisport Telephone Company	260412
KY	Salem Telephone Company	260417
ME	Cobbosseecontee Telephone Company	100005
ME	Hampden Telephone Company	100010
ME	Hartland & St Albans Telephone Company	100011
ME	Somerset Telephone Company	100024
ME	The Island Telephone Company, Inc. (ME)	100007
ME	The West Penobscot Telephone & Telegraph Company	100034
ME	Warren Telephone Company	100031
MI	Chatham Telephone Company	310685
MI	Communication Corporation of Michigan	310672

State	Study Area Name	SAC
MI	Island Telephone Company (MI)	310677
MI	Shiawassee Telephone Company	310726
MI	Wolverine Telephone Company	310738
MN	Arvig Telephone Company	361350
MN	Bridge Water Telephone Company	361362
MN	Mid-State Telephone Company	361433
MN	Mid-State Telephone Company, KMP	361413
MN	Winsted Telephone Company	361507
MS	Calhoun City Telephone Company, Inc.	280448
MS	Myrtle Telephone Company, Inc.	287449
MS	Southeast Mississippi Telephone Company, Inc.	283301
NC	Barnardsville Telephone Company	230469
NC	Saluda Mountain Telephone Company	230498
NC	Service Telephone Company	230500
NH	Contoocook Valley Telephone Company	123321
NH	Hollis Telephone Company, Inc.	123321
NH	Kearsarge Telephone Company	120045
NH	Merrimack County Telephone Company	120047
NH	Union Telephone Company	120049
NH	Wilton Telephone Company, Inc.	120050
NY	Deposit Telephone Company, Inc.	150089
NY	Edwards Telephone Company, Inc.	150092
NY	Oriskany Falls Telephone Corporation	150114
NY	Port Byron Telephone Company	150118
NY	Township Telephone Company, Inc.	150129
NY	Vernon Telephone Company, Inc.	150133
OH	Arcadia Telephone Company	300585
OH	Continental Telephone Company	300607
OH	Little Miami communications Corporation	300613
OH	Oakwood Telephone Company	300645
OH	The Vanlue Telephone Company	300662
OK	Mid-America Telephone, Inc.	432010
OK	Oklahoma Communications Systems, Inc.	431984
OK	Wyandotte Telephone Company	432034
OR	Asotin Telephone Company, OR	532404
PA	Mahanoy & Mahantango Telephone Company	170183
PA	Sugar Valley Telephone Company	170206

State	Study Area Name	SAC
G.C.	M Cl II III T I I C	240522
SC	McClellanville Telephone Company, Inc.	240533
SC	Norway Telephone Company, Inc.	240535
SC	St. Stephen Telephone Company	240544
SC	Williston Telephone Company	240551
TN	Concord Telephone Exchange, Inc.	290559
TN	Humphreys County Telephone Company	290566
TN	Tellico Telephone Company, Inc.	290578
TN	Tennessee Telephone Company	290575
VA	Amelia Telephone Corporation	190217
VA	New Castle Telephone Company	193029
VA	Virginia Telephone Company	190253
VT	Ludlow Telephone Company	140058
VT	Northfield Telephone Company	140061
VT	Perkinsville Telephone Company, Inc.	140062
WA	Asotin Telephone Company, WA	522404
WA	Lewis River Telephone Company, Inc.	522427
WA	McDaniel Telephone Company	522430
WI	Badger Telecom, LLC	330844
WI	Black Earth Telephone Company, LLC	330849
WI	Bonduel Telephone Company, LLC	330851
WI	Burlington, Brighton & Wheatland Telephone Company, LLC	330856
WI	Central State Telephone Company, LLC	330859
WI	Dickeyville Telephone, LLC	330875
WI	Eastcoast Telecom of Wisconsin, LLC	330914
WI	Grantland Telecom, LLC	330930
WI	Mid-Plains Telephone, LLC	330881
WI	Midway Telephone Company, LLC	330909
WI	Mosinee Telephone Company, LLC	330915
WI	Mt. Vernon Telephone Company, LLC	330917
WI	Riverside Telecom, LLC	330943
WI	Scandinavia Telephone Company, LLC	330945
WI	Southeast Telephone Co. of Wisconsin, LLC	330952
WI	Stockbridge & Sherwood Telephone Company, LLC	330954
WI	Tenney Telephone Company, LLC	330958
WI	The Farmers Telephone Company, LLC	330880
WI	The State Long Distance Telephone Company, LLC	330955
WI	UTELCO, LLC	330963
WI	Waunakee Telephone Company, LLC	330968
,,,	1 adminto Totoprione Company, DDC	220,00