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Exec. Director and Secretary Amanda Maxwell
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
PO Box 47250
Olympia, WA 98504-7250

Re: Request for Confidentiality

Pursuant to WAC 480-07-160, Cox Strategic Service, LLC (“Cox”) requests the marked financial information in the balance sheet for Cox Communications, Inc. (“CCI”) required to be submitted with Cox’s application to register as a competitive iVoIP provider in Washington be designated “Confidential Information” and be exempt from public disclosure.

CCI requests confidential treatment for its balance sheet, because the information is confidential financial information that is not available to the public and that would cause CCI substantial competitive injury if disclosed. If competitors had access to CCI’s financial resources they could better determine CCI’s ability to fund network improvements, network expansion, and product development, and gauge its overall financial health and ability to compete generally when developing business plans or responding to RFPs. Access of this information to CCI suppliers could also negatively impact CCI’s ability to negotiate purchase agreements. Accordingly, CCI protects this financial information by limiting the internal circulation to only those employees with a need to know and has an established written policy to limit the disclosure of its balance sheet.

Sincerely,