Annual Reporting for High-Cost Recipients 47 C.F.R. §54.313(h)



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June 23, 2016

Ms. Carlotta S. Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

RE: Docket No. 160119TP, Annual Certifications Related to Eligible Telecommunications Carriers (ETC) Use of the Federal Universal Support, WC Docket No. 14-58

Pursuant to Section 54.313 and 54.422 of the Federal Communications Commission's rules, all reports pursuant to this section shall be filed with the FCC, Universal Service Administrative Company (USAC) and relevant state commissions. I have enclosed a copy of the 2016 annual report and certification that has been filed with the Administrator for the following:

SAC 210336 - Windstream Florida, Inc.

Windstream requests confidential treatment of its (200) Service Outage Reporting (Voice), which is not readily available to Windstream's competition. Release of this information would cause Windstream to reveal proprietary information and trade secrets and cause damage to its competitive position. Windstream requests that this data be treated as trade secret information.

Pursuant to 47 C.F.R. § 0.459 of the Commission's rules, Windstream requests confidential treatment of its (330) Unfulfilled Broadband Service Requests. This information is not made public elsewhere and due to the competitive nature of the broadband product, releasing this information would be valuable to Windstream's broadband competitors and place Windstream at a competitive disadvantage.

Additionally, Windstream requests confidential treatment of its (710) Company Broadband Service Price Offerings. Customers interested in Windstream broadband service can enter their address on Windstream's web page and receive pricing for their location. In addition, Windstream runs broadband advertising in target areas but it does not publish broadband pricing for the entire company. Broadband pricing is competitive sensitive information and not available to the public at this level of detail. Release of this data would be detrimental to Windstream as it would provide other broadband providers servicing these areas a competitive advantage.

Windstream requests that this data be treated as trade secret information. Windstream seeks a protective order of non-disclosure to prevent disclosure of sensitive service outage reporting (section 200), unfulfilled broadband service requests (section 330) and company broadband service price offerings (section 710) filed with the FCC for the calendar year 2015.

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Annual Reporting for High-Cost Recipients 47 C.F.R. §54.313(h) Should you have any questions, please contact me via email at jeff.l.heacox@windstream.com or by phone at 501-748-5390.

Sincerely,

/s/ Jeff Heacox

Jeff Heacox Staff Manager Regulatory Compliance