BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

BLUE RIDGE'S STATEMENT FOR TRADE SECRET PROTECTION

Blue Ridge Telephone Company ("Blue Ridge") hereby files this Statement for Trade Secret Protection for Blue Ridge's Cost Study Data, including all associated workpapers, Blue Ridge's Affiliated Transactions Cost and Market Analysis, Blue Ridge's full detailed trial balances, Blue Ridge's Cost Allocation Manual, and Blue Ridge's detailed calculation of imputed revenues from competitive services for HB 168 impact pursuant to Section 515-3-1-.11 of the Rules of the Georgia Public Service Commission ("PSC"), and states as follows:

1. Rule 515-3-1-.11 requires that a party claiming that information constitutes a trade secret provide, in writing, that basis of this claim. Rule 515-3-1-.11(c) specifically requires that this statement detail (1) the economic benefit derived from the information not being generally known; (2) the economic benefit to others if disclosure were to occur and (3) the procedures utilized to maintain confidentiality. This statement is submitted pursuant to those requirements. Blue Ridge is submitting this statement in accordance with the Commission's rules requiring submission of cost studies stating expenses, revenues and documented analyses comparing cost to market data for certain goods and/or services obtained from or provided to affiliates, full detailed trial balances including numerous subaccounts utilized for internal management purposes and detailed nonregulated accounts for competitive activities, a detailed Cost Allocation Manual, and detailed calculation of imputed revenues from competitive services for HB 168 impact associated with the Universal Access Fund High Cost Application. The expenses and revenues and other financial information and analyses included in these studies are trade secret.

2. The subject trade secret material is the expense and revenue data derived from conducting the cost studies, the specific cost to market comparisons of the affiliated transactions,

numerous subaccounts in the full detailed trial balances utilized for internal management purposes and detailed nonregulated accounts for competitive activities, a detailed Cost Allocation Manual which describes the specific operations and cost methodologies utilized by Blue Ridge and its affiliates, and calculation of imputed revenues from competitive services included in determining the HB 168 impact adjustment to the revenue requirement.

3. The release of this expense, revenue, and details of competitive services information would disadvantage Blue Ridge by providing its competitors an unfair competitive advantage by disclosing data regarding Blue Ridge's customers and finances that is not generally known and would not be readily ascertainable to third parties by any proper means. Blue Ridge takes all appropriate and legal measures to ensure that such information is disseminated internally only to those with a need to know, and that all public measures are taken to protect the information when it is required to be filed in a public forum.

4. Release of Blue Ridge proprietary financial and competitive information to the general public would provide Blue Ridge's competitors an unfair advantage in a competitive market.

This 14th day of December 2022.

BLUE RIDGE TELEPHONE COMPANY



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