BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

NELSON-BALL GROUND'S STATEMENT FOR TRADE SECRET PROTECTION

Nelson-Ball Ground Telephone Company ("Nelson-Ball Ground") hereby files this Statement for Trade Secret Protection for Nelson-Ball Ground's Cost Study Data, including all associated workpapers, Nelson-Ball Ground's Affiliated Transactions Cost and Market Analysis, Nelson-Ball Ground's full detailed trial balances, Nelson-Ball Ground's Cost Allocation Manual, and Nelson-Ball Ground's detailed calculation of imputed revenues from competitive bundle discounts 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. Nelson-Ball Ground 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 bundle discounts 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 Nelson-Ball Ground and its affiliates, and competitive bundle quantities and discount allocations.

3. The release of this expense, revenue, and details of competitive services information would disadvantage Nelson-Ball Ground by providing its competitors an unfair competitive advantage by disclosing data regarding Nelson-Ball Ground's customers and finances that is not generally known and would not be readily ascertainable to third parties by any proper means. Nelson-Ball Ground 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 Nelson-Ball Ground proprietary financial and competitive information to the general public would provide Nelson-Ball Ground's competitors an unfair advantage in a competitive market.

This 14th day of December 2022.

NELSON-BALL GROUND TELEPHONE COMPANY



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