Friend, Hudak & Harris, LLP
Attorneys at Law
Three Ravinia Drive | Suite 1700
Atlanta, GA 30346

770.399.9500 | FH2.com
770.395.0000 Facsimile

FriendHudakHarris

BByrd@fh2.com

July 15, 2024

VIA ELECTRONIC FILING
& FEDEX TRACKING NO. 7773 6275 7370

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-9052

Re: Charter Fiberlink - Georgia, LLC – Semi-Annual Lifeline Subscriber Report; Docket No. 36946 – Eligible Telecommunications Carrier Repository

Dear Ms. Tanner:

On behalf of Charter Fiberlink - Georgia, LLC ("**Charter Fiberlink**"), please find enclosed Charter Fiberlink's Semi-Annual Lifeline Subscriber Report, being submitted in compliance with Georgia Public Service Commission Rule 515-12-1-.35, para. (5) (the "**Lifeline Subscriber Report**").

The Lifeline Subscriber Report is being filed in public disclosure and confidential trade secret versions. Accordingly, we have also enclosed a Trade Secret Petition for filing with the confidential trade secret version of the Lifeline Subscriber Report.

Please do not hesitate to contact us if any questions arise in connection with this submission.

Sincerely,

FRIEND, HUDAK & HARRIS, LLP

Benjamin M. Byrd
Counsel for Charter Fiberlink - Georgia, LLC

Enclosures
cc: Michael R. Moore, Group VP Law – Telephone Regulatory
Daniel Gonzalez, Group VP – State Regulatory Affairs
Marva Johnson, Group VP – State Government Affairs
Tiffany Smink, VP Law – Telephone Regulatory

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of Eligible Telecommunications Carrier Repository Docket	))))	Docket No. 36946

CHARTER FIBERLINK - GEORGIA, LLC
TRADE SECRET PETITION

COMES NOW Charter Fiberlink - Georgia, LLC ("Charter Fiberlink"), and hereby provides certain confidential and proprietary information to the Georgia Public Service Commission (the "Commission") in connection with submitting its Semi-Annual Lifeline Subscriber Report in the above-referenced proceeding. Pursuant to O.C.G.A. § 10-1-760 *et seq*., including O.C.G.A. § 10-1-761(4), and Commission Rule 515-3-1-.11 governing trade secrets, Charter Fiberlink requests trade secret treatment of **Exhibit A** the Semi-Annual Lifeline Subscriber Report, (the "Report") for the following reasons.

I.

O.C.G.A. § 10-1-761(4) defines "trade secret" information as information, without regard to form, including technical or non-technical data, a formula, pattern, compilation, program, method, device, process, technique, drawing, financial data, financial plans, product plans, and lists of actual or potential customers or suppliers, which is not commonly known by or available to the public and which information:

(A) Derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and

(B) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

Commission Rule 515-3-1-.11(1)(c) sets forth that Charter Fiberlink shall provide the legal and factual basis for its assertion that the information for which protection is sought constitute trade secrets and should not be disclosed, including, for each item claimed to be a trade secret:

(1) Why the information derives economic value from not being generally known to others;

(2) How others can obtain economic value from its disclosure; and

(3) Procedures utilized by Charter Fiberlink to maintain its secrecy.

This statement is submitted to meet these requirements.

II.

Information contained in the Report (line counts) is proprietary in nature. Charter Fiberlink derives economic value from the information in the Report because such information is not known to others and is not readily ascertainable by other persons who could obtain economic value from its disclosure or use. Therefore, the Report thus constitutes a trade secret within the meaning of O.C.G.A. § 10-1-761(4).

III.

The information set forth in the Report has been the subject of efforts that are reasonable under the circumstances to maintain its secrecy. Charter Fiberlink maintains the secrecy of the information contained within the Report by retaining possession and control of the information, and by not disclosing such information to others not subject to confidentiality restrictions. Charter Fiberlink takes all appropriate and legal measures to ensure that the information set forth in the Report is provided internally only to those with a need to know such information.

IV.

Charter Fiberlink is submitting the Report to the Commission under protective seal with the designation "CONFIDENTIAL / TRADE SECRET VERSION" or similar markings prominently displayed thereon.

V.

Charter Fiberlink shall maintain a master list of all filings submitted to the Commission pursuant to Rule 515-3-1-.11(d) governing trade secrets. Charter Fiberlink's master list will identify the document submitted, the number of copies submitted, and the docket number related to Charter Fiberlink's filing.

WHEREFORE, Charter Fiberlink respectfully requests that the Commission designate the attached Semi-Annual Lifeline Subscriber Report as confidential and proprietary trade secret information under Commission Rule 515-3-1-.11 and grant Charter Fiberlink such other relief as necessary and pursuant to law to protect the confidentiality of this information.

Respectfully submitted July 15, 2024.

FRIEND, HUDAK & HARRIS, LLP



CHARLES A. HUDAK
BENJAMIN M. BYRD
Three Ravinia Drive, Suite 1700
Atlanta, GA 30346-2131
(770) 399-9500

ATTORNEYS FOR CHARTER FIBERLINK - GEORGIA, LLC

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Trade Secret Petition, by alternative electronic filing, and by depositing same in the United States mail in a properly addressed envelope with adequate postage thereon to insure delivery to the following parties:

Patrick Hanson, Esq.
Assistant Attorney General
Department of Law – State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1300

Mr. Leon Bowles
Director, Telecommunications
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

Dated: July 15, 2024.



CHARLES A. HUDAK
State Bar No. 373980

FRIEND, HUDAK & HARRIS, LLP
Three Ravinia Drive, Suite 1700
Atlanta, Georgia 30346-2131
(770) 399-9500

EXHIBIT A

Semi-Annual Lifeline Subscriber Report

****Confidential – Redacted****

PUBLIC DISCLOSURE VERSION

GEORGIA PUBLIC SERVICE COMMISSION
LIFELINE SEMI-ANNUAL SUBSCRIBER REPORT

As of: June 30, 2024

Company Name: Charter Fiberlink - Georgia, LLC

Completed By: Tiffany Smink, VP Law – Telephone Regulatory

Criterion	Number of Subscribers
Medicaid	[REDACTED]
Supplemental Nutrition Assistance Program	[REDACTED]
Supplemental Security Income (SSI)	[REDACTED]
Federal Public Housing Assistance (FPHA)	[REDACTED]
Veterans and Survivors Pension Benefit	[REDACTED]
135% of the Federal Poverty Guidelines	[REDACTED]
Total Number of Subscribers	[REDACTED]