

ILLINOIS COMMERCE COMMISSION

2016 MAR 31 P 1:28

Charter Fiberlink - Illinois, LLC )  
 )  
Petition for Confidential Treatment )  
of the 2015 Annual Report )

CHIEF CLERK'S OFFICE  
Docket No. 16-0224

**VERIFIED PETITION OF CHARTER FIBERLINK - ILLINOIS, LLC FOR  
CONFIDENTIAL TREATMENT OF 2015 ANNUAL REPORT**

Charter Fiberlink - Illinois, LLC ("Charter Fiberlink") hereby petitions the Illinois Commerce Commission (the "Commission") to grant proprietary and confidential treatment of Charter Fiberlink's 2015 Annual Report. In support of this petition, Charter Fiberlink states as follows:

1. Charter Fiberlink is certified to provide local exchange and interexchange telecommunications services within the State of Illinois and competes with local exchange and interexchange carriers, as well as with others providing communications services.

2. Charter Fiberlink is required to file annual reports with the Commission until such time as the Commission determines that such reports are not required. *See* 220 ILCS 5/13-101, Sec. 13-401 of the Public Utilities Act. 220 ILCS 5/5-109, Sec. 5-109 of the Public Utilities Act provides that the Commission may direct that annual reports be maintained as confidential and proprietary information of the filing entity.

3. Charter Fiberlink's 2015 Annual Report consists of specific commercial and financial information, including its operating revenues and expenses in Illinois. Such information is highly competitive, sensitive, proprietary, confidential and of the type that would be of particular interest to Charter Fiberlink's competitors or potential competitors.

4. 220 ILCS 5/4-404, Sec. 4-404 of the Public Utilities Act states that the Commission must provide adequate protection for confidential and proprietary information furnished, delivered or filed by any person, corporation or other entity. 5 ILCS 140/7, Sec. 7(2)(g) provides for protection of trade secrets and commercial or financial information furnished under a claim that they are proprietary, privileged or confidential, and that disclosure of such information would cause competitive harm to the person or business. Charter Fiberlink's 2015 Annual Report contains such confidential and proprietary information, trade secrets, and commercial and financial information, including the specific information in the 2015 Annual Report regarding Charter Fiberlink's operating revenues and expenses in Illinois. Charter Fiberlink as a matter of internal company policy and practice keeps such information confidential in perpetuity.

5. The Commission previously has afforded proprietary and confidential treatment to the same type of information for a period of not less five (5) years. *See, e.g.*, Final Orders issued July 7, 2011 in Commission Dockets No. 08-0225 and 08-0226. *See also* Commission Rule 200.430(b) (five (5) year period applicable to proposed expiration dates of protective orders). Notwithstanding, in Docket No. 15-0246, the Commission limited the period applicable to Charter Fiberlink's 2014 Annual Report to two (2) years.

6. Accordingly, it is imperative that the Commission maintain Charter Fiberlink's 2015 Annual Report under seal for as long as permitted under law and, in any event, not less than two (2) years following the issuance of an order in this proceeding. Disclosure of the 2015 Annual Report at an earlier date would cause Charter Fiberlink serious competitive harm because

it would give competitors information and data regarding Charter Fiberlink's finances, relative position and scope of entry in the marketplace for communications services in Illinois.

7. Copies of all pleadings, notices and correspondence in this docket should be sent to the undersigned.

8. Charter Fiberlink agrees to accept service by electronic means as provided for in the Illinois Administrative Rules.

**WHEREFORE**, for the above-stated reasons, Charter Fiberlink requests that the Commission issue an order, without hearing, granting proprietary and confidential treatment and protection from disclosure of Charter Fiberlink's 2015 Annual Report for as long as permitted under law and, in any event, not less than two (2) years following the issuance of an order in this proceeding.

Respectfully submitted,



---

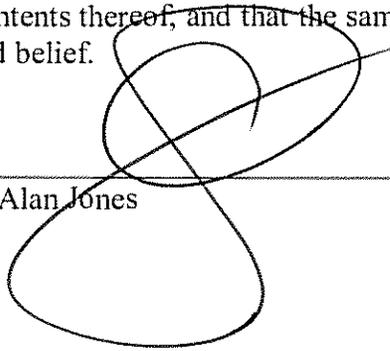
Michael R. Moore, Esq.  
VP & Associate General Counsel,  
Regulatory Affairs  
Charter Communications, Inc.  
12405 Powerscourt Drive  
St. Louis, Missouri 63131-3674  
Telephone: 314-543-2414  
Email: Michael.Moore@charter.com

Dated: March 30, 2016

VERIFICATION

STATE OF MISSOURI    )  
  )  
COUNTY OF ST. LOUIS    )

I, Alan Jones, state that I am VP, Tax, for Charter Fiberlink - Illinois, LLC, that I have read the foregoing Verified Petition of Charter Fiberlink - Illinois, LLC, for Confidential Treatment of 2015 Annual Report, and know the contents thereof, and that the same are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Alan Jones

Subscribed and sworn to me  
this 30<sup>th</sup> day of March 2016.

  
\_\_\_\_\_  
Notary Public

RANDY N. REMMING  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for St. Louis County  
My Commission Expires: December 01, 2018  
Commission Number: 14396279

**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing together with the Verification to be served upon all parties on the Illinois Commerce Commission's service list for Docket No. 14-0264 by electronic mail or by U.S. Mail.

This 21 day of March, 2016.

\_\_\_\_\_  
Alan Jones