

**SureWest Telephone**  
**Request for Confidential Treatment of Cost Support Material**  
**Transmittal No. 12**  
**October 1, 2004**

SureWest Telephone (SureWest) respectfully requests that the cost support material transmitted with the above-referenced transmittal be accorded confidential treatment. SureWest requests confidentiality and will make its cost support available to those signing a nondisclosure agreement, pursuant to the Commission's Order in GC Docket No. 96-55, 13 FCC. Rcd 24816 (1998). In support whereof, SureWest provides:

1) the cost support material for which confidential treatment is sought consists of spreadsheets with privileged and detailed information regarding specific sales and revenue data and projections that are not otherwise publicly available, have not been previously disclosed nor are they easily discernable from other public information;

2) the cost support information is provided in conjunction with SureWest's tariff filing to introduce a promotion;

3) the subject information contains financial projection and pricing data that are of a highly-privileged nature. The data consists of customer penetration, pricing, retention and subscription projections;

4) the data relates to digital subscriber line service that is highly competitive nationwide. Both incumbent local exchange carriers and competitive local exchange carriers direct marketing efforts to the same potential customer base in order to obtain end users;

5) disclosure of the information could result in substantial competitive harm as a result of competitors obtaining or disseminating SureWest's marketing and planning strategies as well as penetration and retention projections. Competitors would have a significant advantage over SureWest as they could tailor their strategies based upon SureWest's expressed intentions;

6) SureWest does not make this information publicly available. In fact, this information is afforded similar protection by California Public Utility Commission General Order 66-C;

7) this material, because of its highly sensitive financial character, is not routinely available for public inspection, it has not been previously disclosed nor is it easily discernable from other public information. The public interest would not be prejudiced by protection of this information;

8) SureWest believes this material should not be made publicly available for three years. This time limitation will permit SureWest to implement the proposed marketing and sales strategies, review the strategies, and adjust the same in accordance with actual performance. As a result, this information may remain an underlying foundation for sales and marketing plans for several years in to the future.