

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Valor Telecommunications Enterprises, LLC )  
Tariff F.C.C. No. 1 )  
 )  
Transmittal No. 44 )

**REQUEST FOR CONFIDENTIAL TREATMENT OF COST SUPPORT**

Valor Telecommunications Enterprises, LLC (“Valor”) respectfully requests confidential treatment of cost and revenue data (“Cost Support”) that it is providing in connection with Transmittal No. 44, filed on October 6, 2004.

Pursuant to Section 0.459 of the Commission’s Rules, Valor states the following:

1. The Cost Support that accompanies Valor’s Tariff Transmittal No. 44 consists of data both in the aggregate and for specific categories of cost and revenue. Such data is of the type that businesses normally keep confidential and that Valor in fact keeps confidential. The confidential information provided is sensitive commercial data. *See* 5 U.S.C. § 552b(4).
2. The confidential information provides data that is competitively sensitive within the meaning of Section 0.459(b)(4) of the Commission’s Rules, 47 C.F.R. § 0.459(b)(4), specifically, cost and unit calculations and projections.
3. Valor has previously submitted certain cost support concerning its services to the Commission, as an accompaniment to tariff filings. However, Valor has determined that the cost and revenue data concerning its offerings is financial information that has become too sensitive for public disclosure, absent confidential treatment and protection. This information has not previously been disclosed to the public. Valor therefore believes that the current Cost Support filing is separate

and distinct from previous submissions and should accordingly be distinguished for confidentiality purposes under Section 0.459(b)(7) of the Commission's Rules, 47 C.F.R. §0.459(b)(7).

4. The Cost Support submitted with Transmittal No. 44 provides data regarding operations that are subject to competition. Public disclosure of Valor's Cost Support is therefore commercially sensitive and would very likely cause substantial harm to Valor's operations if it were publicized. For example, if this Cost Support were publicly disclosed, it would allow potential competitors to analyze the revenues to Valor and the costs Valor incurs in providing its offerings. This would allow a competitor an unfair and artificial competitive advantage and permit it to determine ways in which to decrease or limit Valor's market share or revenues. Such would undermine Valor's competitive efforts.

5. Valor does not object to limited disclosure of the confidential information, so long as a party that wishes to view it executes a standard Commission approved confidentiality agreement. The Agreement will ensure that the confidential material is only used to assist the party in participating in review of the tariff filing.

WHEREFORE, Valor respectfully requests that the Cost Support submitted with its Transmittal No. 44 be deemed confidential and be indefinitely protected from public inspection.

Respectfully submitted,

/s/

Gregory J. Vogt  
Wiley Rein & Fielding LLP  
1776 K Street, NW  
Washington, DC 20006  
(202) 719-3240  
(202) 719-7049  
*Counsel for Valor Telecommunications Enterprises, LLC*

October 6, 2004