

**BEFORE THE  
STATE CORPORATION COMMISSION OF THE STATE OF KANSAS**

**In the Matter of the Petition of DISH )  
Wireless L.L.C. for Designation as an )  
Eligible Telecommunications Carrier in )  
the State of Kansas for the Limited )     **Docket No. 23-DWLZ-676-ETC**  
Purpose of Providing Lifeline Service to )  
Qualifying Customers )**

**REQUEST FOR CONFIDENTIAL TREATMENT  
OF INFORMATION CONTAINED IN THE RESPONSE  
OF DISH WIRELESS L.L.C. TO COMMISSION'S DATA REQUEST**

Pursuant to K.S.A. 66-1220a and K.A.R. 82-1-221a, DISH Wireless L.L.C. dba Gen Mobile ("DISH Wireless" or the "Company"), through its undersigned counsel, hereby respectfully requests the Kansas Corporation Commission (the "Commission") to grant confidential treatment of certain information provided by the Company in connection with the Discovery Request No. KCC-6 (the "Discovery Request") in the captioned docket.

The information sought by Staff DR No. 2 includes confidential and proprietary information and/or information prohibited from disclosure (the "Protected Information"). Therefore, DISH Wireless files this response confidentially to the Commission.

The Company implements substantial safeguards to protect the Protected Information, does not allow for public disclosure thereof, and maintains the Protected Information on a need-to-know basis. Making this Protected Information publicly available would give an unfair economic and competitive advantage to DISH Wireless' competitors as it contains specific data that could provide competitors with valuable insight into the Company's operations as well as information about its underlying partner carriers that is not publicly available.

In addition, disclosure of the Protected Information to the question listed herein would have a materially adverse effect on DISH Wireless. Due to the sensitive nature of the Protected Information, it would be appropriate for the Commission to limit access to and public disclosure of it. The Protected Information is being provided to the Commission in connection with the Petition so that the Commission may exercise its governmental functions – determining DISH Wireless’ petition to be an ETC in Kansas. No legitimate purpose would be served by allowing this information to be publicly available to competitors in the telecommunications industry or anyone other than the Commission and its Staff.

The Protected Information for which confidential treatment is requested is marked **“CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE”** and is being provided to Staff under seal. Any review of the Protected Information should be limited to the Commission and its Staff for determining the ETC designation of DISH Wireless in the State of Kansas.

As such, DISH Wireless respectfully requests the Commission and its Staff to treat the responses to Question No. 2 as confidential. Commission and Staff may reach out to the undersigned counsel for additional information or inquiries regarding this request for confidential treatment.

For the reasons stated herein, DISH Wireless respectfully requests the Commission treat the protected information provided under Question No. 2 of the Discovery Request, as confidential in accordance with the terms of this request.

Respectfully submitted,

Dated: February 21, 2025

  
Mark P. Johnson KS Bar # 22289  
Dentons US LLP

4520 Main Street, #1100  
Kansas City, MO 64111  
Tel.: (816) 460-2424  
Cell: (816) 456-5044  
[Mark.Johnson@dentons.com](mailto:Mark.Johnson@dentons.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served electronically on the follow counsel of record on this 21<sup>st</sup> day of February, 2025.

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604

PHOENIX Z. ANSHUTZ  
PENNER LOWE LAW GROUP, LLC  
245 N WACO STREET, STE 125  
WICHITA, KS 67202

  
\_\_\_\_\_  
Mark P. Johnson