

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Application of Everfast Fiber Networks LLC for a Certificate of Convenience and Authority to Provide Local Exchange and Exchange Access Service, and Interexchange Service Within the State of Kansas.	) ) ) ) ) ) )	Docket No. 23-EFNT-258-COC
---	---------------------------------	----------------------------

**MOTION TO FILE CONFIDENTIAL FINANCIAL RECORDS UNDER SEAL**

Comes now Everfast Fiber Networks LLC (“the Company”), the Applicant herein, and moves pursuant to K.A.R. 82-1-221a to file certain confidential business records under seal. In support of this Motion, the Applicant states as follows:

1. Concurrent with the filing of this Motion the Applicant is filing its Application for certification to provide intrastate telecommunications services in Kansas. As part of that Application, the Applicant has produced and will file a profit and loss statement and balance sheet as Exhibit A to the Application. The information contained in those documents is confidential, not publicly issued by the Applicant, and contains sensitive information that would be of value to competitors.

2. Under K.A.R. 82-1-221a(5)(b) the Applicant seeks confidential treatment of the financial information pursuant to this Motion. The potential harm presented by disclosure of the documents is that competitors could determine the scope of the Applicant’s present and anticipated investment in its Kansas City telecommunications operation, allowing competitors to change their investments in such services to maximize their competitive advantage.

3. The Applicant's is filing two versions of its Application: a public version with Exhibit A redacted and a confidential version with Exhibit A included.

WHEREFORE, the Applicant requests the Commission grant the Applicant's Motion to file the financial statements contained in Exhibit A to its Application under seal and that they not be publicly available in the Commission's records.

Respectfully submitted,



Mark P. Johnson KS #22289  
Dentons US LLP  
4520 Main Street  
Suite 1100  
Kansas City, MO 64111  
Phone: 816/460-2424  
Fax: 816/531-7545  
Mark.johnson@dentons.com

Attorneys for Everfast Fiber Networks  
LLC

STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF JACKSON )

Comes now Mark P. Johnson, being of lawful age and duly sworn, who states that he prepared the foregoing pleading and that the information contained therein is true and accurate to the best of his knowledge, information, and belief.

Further affiant sayeth not.



Mark P. Johnson

Sworn to before me this 22<sup>nd</sup> day of August, 2022.

Victoria Gash  
Notary Public

My commission expires:

