



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

12/19/25

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Appeal of Alleswolke Wireless LLC
U4630C from Citation No. CD-2025-11-
001 in the amount of \$21,000 issued
November 20, 2025, by the
Communications Division Pursuant to T-
17601.

**ALLESWOLKE WIRELESS LLC (U4630C) MOTION FOR LEAVE TO
FILE THE CONFIDENTIAL VERSION OF ITS APPEAL OF CITATION
NO. CD-2025-11-001 UNDER SEAL**

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Dated: December 19, 2025

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Pursuant to the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Rules 11.1 and 11.4, and in accordance with Decision (“D.”) 06-06-006, D.08-04-023, D.20-07-005, and D.21-11-029 (“Confidentiality Decisions”), Alleswolke Wireless LLC (“Alleswolke”) hereby files this *Motion for Leave to File the Confidential Version of Its Appeal of Citation No. CD-2025-11-001 Under Seal* (“Motion”).

Alleswolke is concurrently filing with this motion information to support its appeal of Citation No. CD-2025-11-001 (the “citation”). Specifically, Alleswolke is publicly filing and serving a redacted, public version of its appeal. Alleswolke moves the Commission to grant leave to file the confidential version of its appeal under seal and approve the redactions in the public version.

The redacted information in the appeal includes Alleswolke’s monthly count of access lines and its monthly intrastate revenues. These financials and customer counts qualify for confidential treatment as trade secrets, and for protection under the California Public Records Act (“CPRA”) public interest “balancing test” set forth in Government Code Section 7922.000. Alleswolke has not disclosed these figures as part of any public financial reporting, and the company has procedures and protocols designed to maintain these materials as confidential. Disclosure of this information would expose Alleswolke to unfair competition, especially because it does not have parallel access to similar information from its competitors. Accordingly,

Alleswolke requests that the Commission grant this motion and allow it to file and maintain the confidentiality of certain commercially sensitive information under seal in this proceeding. These materials qualify as trade secrets, the statutory protections for which are incorporated into the exemptions from disclosure in the CPRA. *See* Gov't Code § 7927.705; Civ. Code § 3426.1(d); Evid. Code § 1060. The customer counts and revenue figures meet the definition of trade secrets because they: (1) derive economic value from not being known to the public or to the Frontier California ILECs' competitors; and (2) are subject to reasonable efforts to maintain their confidentiality by the Frontier California ILECs. *See* Cal. Civ. Code § 3426.1(d); *Lipton v. Superior Court*, 48 Cal. App. 4th 1599, fn. 20 (1996) (trade secrets include "confidential business information").

The information contained in Exhibit D to the Application is further protected from public disclosure under the CPRA "balancing test" outlined in Government Code Section 7922.000. Information should be protected from disclosure where "on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by the disclosure of the record." *International Federation of Professional and Technical Engineers, Local 21, AFLCIO v. Superior Court*, 42 Cal. 4th 319, 329 (2007). This balancing test should protect competitive information from disclosure because a strong public interest exists in encouraging vigorous competition for the benefit of consumers.

Alleswolke operates in a highly competitive market, in which its financial status and customer counts would be relevant to current and potential competitors in informing their operational, build-out, and marketing strategies. The disclosure of customer counts and revenue information pertaining could distort competition in this market, to the detriment of customers. Alleswolke derives economic value from protecting this information against disclosure because it provides strategic insight regarding its overall financial condition as well as its financial operations.

A fully-unredacted, confidential version of the appeal has been served electronically on the Commission's Chief Administrative Law Judge and, pursuant to Resolution ALJ-431, securely filed electronically through the Commission's electronic filing system. A public, redacted version of the Application has been filed electronically through the Commission's electronic filing system.

Dated: December 19, 2025

Respectfully submitted,

/s/ *Jordan Pinjuv*

Jordan Pinjuv
Wilkinson Barker Knauer LLP

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[PROPOSED] ORDER GRANTING MOTION

On December 19, 2025, Alleswolke Wireless LLC U4630C (“Alleswolke”) filed a motion for leave to file under seal and maintain the confidentiality of certain materials submitted in the above-captioned appeal from Citation No. CD-2025-11-001. Specifically, Alleswolke seeks to file monthly customer counts and revenues under seal. The information identified as confidential is considered proprietary and sensitive Alleswolke. Through its motion, Alleswolke has demonstrated that the information for which it seeks confidential treatment constitutes trade secret information and that the public interest in disclosure is outweighed by the public interest in maintaining confidentiality of the information.

IT IS THEREFORE ORDERED, for good cause shown:

1. Alleswolke’s motion for leave to file under seal and maintain the confidentiality of certain information is granted.
2. The Docket Office is directed to retain the confidential version of the appeal under seal.
3. The material retained under seal shall not be accessible or disclosed to persons other than Commission staff except on further order or ruling of the Commission, the

Administrative Law Judge to whom this proceeding is assigned, or the Administrative Law Judge then designated as the law and motion judge.

Dated: _____, 2025

Administrative Law Judge