

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



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Application of Race Telecommunications, LLC)
(U-7060-C) for a Full-Facilities Based)
Certificate of Public Convenience and) Application 26-05-012
Necessity pursuant to Public Utilities Code)
Section 1001.)

**MOTION OF RACE TELECOMMUNICATIONS, LLC (U-7060-C) FOR LEAVE TO
FILE CONFIDENTIAL VERSIONS OF ATTACHMENTS 3, 4, AND 5 TO ITS
RESPONSE TO THE ADMINISTRATIVE LAW JUDGE'S REQUEST FOR
ADDITIONAL INFORMATION UNDER SEAL**

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September 3, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
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I. INTRODUCTION AND RELIEF REQUESTED

Pursuant to Rules 11.1 and 11.4 of the Commission’s Rules of Practice and Procedure, General Order 66-D, Race Telecommunications, LLC (U-7060-C) (“Race”) respectfully moves for leave to file under seal the confidential, unredacted versions of Attachments 3, 4, and 5 to Race’s September 3, 2026 Response to the Administrative Law Judge’s Request for Additional Information (“Response”), filed on September 3, 2026.

The requested protection is deliberately narrow. Race seeks confidential treatment only for exact pole or structure identifiers, geographic coordinates, street-location information, and equivalent facility-location fields that identify particular Race facilities or associate them with specific inspection findings. Race is filing public, redacted versions that disclose the audit dates and scope, applicable safety rules, structure types, each substantive audit finding, Race’s corrective actions, and completion dates. The Administrative Law Judge and the Commission will receive the unredacted versions. Thus, the public can evaluate both the audits and Race’s response in large part.

Good cause exists because disclosure would materially assist physical or electronic targeting of Race’s broadband and telecommunications network facilities, while adding little to the public’s ability to evaluate compliance. The same compiled location and identifier data also derive independent value from not being generally known by competitors and is subject to reasonable measures to preserve secrecy. The Commission has recognized that narrow redaction of nonpublic, detailed network-location information may be warranted when disclosure would make physical or electronic attack easier.¹

II. INFORMATION FOR WHICH PROTECTION IS SOUGHT

Race requests confidential treatment of the fields identified below. Page references are to the public PDF compilations attached to the Response; the confidential versions contain the corresponding unredacted information.

Attachment	Pages / fields	Information withheld	Why disclosure would harm protected interests
3	PDF pp. 4–6 (audit report pp. 2–4); PDF pp. 7–9 (audit report pp. 5–7)	Structure IDs and locations in the inspection table; pole numbers, structure IDs, and specific handhole street addresses embedded in finding narratives.	Links exact structures and customer-adjacent facilities to Race’s network and, in some instances, to a reported condition. The compiled linkage enables targeted reconnaissance or interference and reveals nonpublic network-footprint information.
4	PDF p. 6; attached spreadsheet/table columns B and D	Structure ID Number and Location fields for the audited poles, vaults, and related facilities.	Provides a facility-by-facility locator list and reveals Race’s deployment footprint and customer-linked facility locations. Competitors could avoid field-survey and mapping costs; bad actors could more efficiently target specific Race network assets.
5	PDF pp. 7–10 (audit report pp. 4–7)	Latitude, Longitude, and Facility ID for 90 inspection locations.	Exact coordinates and identifiers, when paired with the public findings for each numbered location, create a particularly actionable map for selecting and locating facilities associated with identified conditions.

III. LEGAL STANDARD

Rule 11.4(a) requires a party seeking to seal information in a formal proceeding to file a motion and attach a proposed ruling. General Order 66-D, Section 3.3, likewise directs parties in formal proceedings to use Rule 11.4 or another process established by the assigned Administrative Law Judge.

¹ Decision (“D.”) 20-12-021 at pp. 78–80, 138–140; Conclusions of Law 41, 43, and 46–47; D.16-08-024 at p. 25; see also D.20-08-031 at pp. 13–15.)

Government Code Section 7922.000, formerly Section 6255(a), permits withholding when the public interest served by nondisclosure clearly outweighs the public interest served by disclosure. D.20-08-031 identifies former section 6255(a) as the principal basis for evaluating critical-infrastructure confidentiality claims and, for submissions outside formal proceedings, sets forth a baseline showing focused on whether the information is nonpublic and whether disclosure could facilitate the physical or electronic compromise of utility infrastructure.² Although that baseline does not directly govern a Rule 11.4 motion filed in a formal proceeding, the same considerations are relevant to the case-specific balancing analysis here.

In D.20-12-021, the Commission applied that balancing analysis in a formal telecommunications proceeding, protected a narrow subset of nonpublic, detailed network-location information where disclosure could facilitate attacks and create public-safety risks, and rejected claims based on generalized or speculative harm.³

IV. GOOD CAUSE SUPPORTS THE REQUESTED PROTECTION

A. The redactions are precise and preserve meaningful public access.

The motion to file under seal does not ask to seal whole audit reports or to conceal safety findings. The public versions disclose the governing rules, the type and number of structures inspected, all substantive deficiencies, Race's responses, remedial work, and timing. Only the locator fields and equivalent identifiers are redacted. This tailoring preserves the public interest in regulatory accountability and permits public scrutiny of Race's compliance, while avoiding release of information unnecessary to that scrutiny.

B. The public interest in network security and reliable communications clearly outweighs the marginal value of disclosing exact locators.

An isolated pole or vault may be visible from a public place. What is not readily observable, and what Race seeks to protect, is the compiled association among an exact coordinate or address, a facility identifier, Race's equipment and network footprint, and a specific audit location or reported condition. A person observing a structure from the street ordinarily cannot obtain that integrated dataset. Race does not publish the location information related to its network facilities, and instead holds it consistently confidential.

² D.20-08-031 at pp. 13–15; see also p. 18, Conclusion of Law 8.

³ D.20-12-021 at pp. 53–54, 78–80, 138–140, Conclusions of Law 41, 43, and 46–47.

Disclosure would substantially reduce the time and effort needed to identify and select particular network assets for vandalism, fiber cuts, vault intrusion, equipment tampering, theft, or coordinated disruption. Where exact locations and identifiers can be paired with public descriptions of audit conditions, the information is more actionable still. Compromise of these assets could disrupt Race's broadband and voice services and impair communications used by customers, businesses, public agencies, and emergency responders. Facility identifiers can also be used in pretexting or social-engineering efforts and can help a bad actor correlate public information with improperly obtained operational information. The harm is therefore concrete and tied to the precise data at issue, not merely to generalized concern about infrastructure.

The Commission's treatment of detailed network maps in D.20-12-021 supports the same measured result here: exact facility-level locators that are not ordinarily public may be withheld where they would make physical or electronic attack easier, while the remainder of the underlying report remains public. Because the public versions already permit full evaluation of the audits and Race's corrective work, the incremental transparency value of exact identifiers and coordinates is slight. The public interest in preventing attacks and preserving reliable communications clearly outweighs that marginal value under Government Code section 7922.000.

C. The compiled facility information is protected trade-secret information.

The unredacted fields also form a nonpublic compilation of exact facility identifiers, locations, facility types, Race network associations, and, for some locations, maintenance or inspection conditions. As explained in the accompanying declaration, this compilation has independent economic value because a competitor could use it to discern portions of Race's network footprint, deployment patterns, and customer-linked facility locations without incurring the time and expense of field survey, mapping, and verification. It likewise has value to bad actors seeking to target or exploit Race's facilities.

Race takes reasonable measures to protect the compilation. The information is maintained on a private network drive protected by security controls; access is limited to a subset of approved employees with a business need; and employees are subject to confidentiality and technology-security obligations. Race does not publish the compiled data. Because the substantive audit findings and responses remain public and the Commission receives the unredacted material, recognizing the privilege will neither conceal fraud nor work injustice. The information therefore qualifies for protection under Evidence Code Section 1060, Civil Code Section 3426.1, subdivision (d), and Government Code Section 7927.705.

D. Limited customer-location privacy interests independently favor nondisclosure. A small subset of the location fields identifies street addresses associated with underground facilities at or immediately adjacent to individual customer premises. Publishing those addresses together with the fact of Race service or equipment placement would reveal customer-linked information that is unnecessary to evaluate the audit. The privacy interest protected by Article I, Section 1 of the California Constitution further tips the case-specific balance under Government Code Section 7922.000 in favor of the narrow redactions.

E. Scope, duration, and access.

Race requests that the confidential versions be maintained under seal and made available only to the Commission, its staff, and persons authorized by the assigned Administrative Law Judge, unless Race consents or the Commission orders otherwise after notice and an opportunity to be heard. Protection should continue while the identified facilities remain in use and the compiled information is not generally public.

V. CONCLUSION

For the foregoing reasons, Race respectfully requests that the assigned Administrative Law Judge grant this motion and accept under seal the confidential, unredacted versions of Attachments 3, 4, and 5 to Race's September 3, 2026 Response.

Dated: September 3, 2026

Respectfully submitted,

/s/ Rachelle Chong

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DECLARATION OF CARLOS ALCANTAR
IN SUPPORT OF MOTION TO FILE CONFIDENTIAL VERSIONS
OF ATTACHMENTS 3, 4, AND 5 UNDER SEAL

I, Carlos Alcantar, declare as follows:

1. I am the Chief Technology Officer of Race Telecommunications, LLC (“Race”). I make this declaration from my personal knowledge and, if called as a witness, could and would testify competently to the matters stated here.
2. In my role, I am familiar with Race’s network facilities, information-security practices, and records concerning the location and identification of poles, vaults, handholes, and related communications facilities.
3. I have reviewed the confidential, unredacted versions of Attachments 3, 4, and 5 to Race’s September 3, 2026 Response to the Administrative Law Judge’s Request for Additional Information. The specific information for which Race seeks protection consists of: (a) structure and pole identifiers and location entries in Attachment 3; (b) the Structure ID Number and Location fields in Attachment 4; and (c) the Latitude, Longitude, and Facility ID fields in Attachment 5. Some narratives in Attachment 3 also contain an exact pole number, structure identifier, or customer-adjacent handhole address.
4. Race is not seeking to conceal the audit scope, the rules cited, the kinds of structures inspected, any substantive audit finding, Race’s corrective action, or the timing of corrective work. Those matters appear in the public versions. Only fields or narrative fragments that locate or uniquely identify particular Race-associated facilities are withheld.
5. Some poles, vaults, and related structures may be visible from public places. The confidential information is not the mere existence of those structures. It is the compiled association among exact coordinates or addresses, facility identifiers, Race’s equipment and network footprint, and particular audit locations or reported conditions. That integrated dataset is not discernible by ordinary observation and is not customarily published by Race.
6. Public disclosure would materially reduce the work required for a person to locate and select particular communications assets for vandalism, fiber cuts, vault intrusion, equipment tampering, theft, or coordinated disruption. Pairing exact locations or identifiers with the public audit findings makes the dataset particularly useful for targeted reconnaissance. Damage to the identified facilities could disrupt Race’s broadband and voice services and impair communications used by customers, businesses, public agencies, and emergency responders.

7. The facility identifiers can also be used to correlate public information with operational information obtained through pretexting, social engineering, credential compromise, or other unauthorized means. Disclosing the compiled identifiers and locators would therefore increase the risk of both physical and electronic compromise.
8. The compiled information also has actual or potential independent economic value from not being generally known. A competitor could use it to infer parts of Race's network footprint, deployment patterns, and customer-linked facility locations while avoiding the time and expense of field survey, mapping, and verification.
9. Race maintains this type of information on a private network drive protected by security controls. Access is limited to a subset of approved employees with a business need to know. Race employees are subject to confidentiality agreements and technology-security obligations, and Race does not publish the compiled facility-location and identifier data.
10. Disclosure is not necessary to expose fraud or prevent injustice. The Commission and the assigned Administrative Law Judge will receive the unredacted versions, and the public versions disclose all substantive audit findings and Race's response. In my judgment, withholding only the exact locators and identifiers is the narrowest practical way to reduce the security, competitive, and customer-privacy risks described above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 3, 2026, at South San Francisco, California.



Carlos Alcantar

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**[PROPOSED] RULING GRANTING MOTION OF RACE
TELECOMMUNICATIONS, LLC (U-7060-C) TO FILE CONFIDENTIAL
VERSIONS OF ATTACHMENTS 3, 4, AND 5 UNDER SEAL**

Race Telecommunications, LLC (Race) filed a motion under Rules 11.1 and 11.4 seeking leave to file under seal confidential, unredacted versions of Attachments 3, 4, and 5 to its September 3, 2026 Response to the Administrative Law Judge's Request for Additional Information. Race also filed public versions redacting exact pole or structure identifiers, geographic coordinates, street-location information, and equivalent facility-location fields.

The motion is supported by the declaration of Race's Chief Technology Officer and identifies the precise portions for which protection is sought. Race has shown that the information is not customarily public; that it compiles exact locators and identifiers with Race-network associations and, in some instances, audit conditions; and that disclosure would facilitate physical or electronic targeting of communications facilities. Race also has shown that the compiled information has independent value from not being generally known and is subject to reasonable measures to preserve secrecy. The public versions disclose the substantive audit findings and corrective actions.

Good cause having been shown under Government Code Sections 7922.000 and 7927.705, Evidence Code Section 1060, Civil Code Section 3426.1, and applicable Commission authority, IT IS RULED that:

1. Race's motion is granted.
2. The confidential, unredacted versions of Attachments 3, 4, and 5 to Race's September 3, 2026 Response shall be received and maintained under seal.
3. The sealed material shall be available only to the Commission, its staff, and persons authorized by the assigned Administrative Law Judge, unless Race consents or the Commission orders otherwise after notice and an opportunity to be heard.
4. The material shall remain under seal while the identified facilities remain in use and the compiled information is not generally public. Race shall notify the Commission if it determines that the grounds for confidential treatment no longer apply.
5. This ruling does not restrict public access to the redacted versions of Attachments 3, 4, and 5.

IT IS SO RULED.

Dated: _____

Administrative Law Judge