BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
11/19/26
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A2606003

Application of American Broadband and Telecommunications Company LLC (U-4457-C) for Appeal Request for Expedited Schedule	A.2606003 (Filed May 15, 2026)

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rule 11.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, American Broadband and Telecommunications Company LLC (AMBT or the Company) respectfully submits this Motion for Leave to File under Seal the Response to Request for Additional Information Related to the Motion for Preliminary Injunction (Response) filed in the above-captioned proceeding on November 19, 2026.[1] For the reasons detailed below, AMBT requests that certain portions of the Response be designated as confidential and protected from disclosure to the public.[2]

AMBT submits that the following types of information provided in the Motion for Preliminary Injunction qualify for confidential treatment:

1. Non-public information regarding the Company's financial status and operations. Relevant confidential information has been redacted from the Response at pages 8, 9, 16, 17, 18, 19, and 20.

[1] AMBT notes that General Order (GO) 66-D also provides procedures for submission of information to the Commission with claims of confidentiality. *See* GO 66-D, Section 3.2. However, GO 66-D, Section 3.3, provides: "The requirements of Section 3.2 of this GO do not apply when a party in a formal proceeding files information in the docket. To obtain confidential treatment of information to be filed in the docket of a formal proceeding, the submitter must file a motion pursuant to Rule 11.4 of the Commission's Rules" A proceeding initiated by an application is a formal proceeding. *See* https://www.cpuc.ca.gov/about-cpuc/transparency-and-reporting/ex-parte-communications ("A formal proceeding is a proceeding initiated by application, complaint, order instituting investigation, or order instituting rulemaking.").

[2] A declaration from AMBT in support of the request for confidential treatment is attached to this Motion.

2. Non-public information regarding the vendors with which AMBT contracts. Relevant confidential information has been redacted from the Response at pages 7 and 8.

The portions of the Response identified above qualify for confidential treatment under the California Public Records Act (CPRA). Section 7927.705 of the California Government Code provides that the CPRA does not require the disclosure of records when such disclosure is "exempted or prohibited pursuant to federal or state law …."[3] As described below, both federal and state laws prohibit disclosure of the identified portions of the Response.

First, Section 7927.605 of the California Government Code specifically exempts disclosure of "corporate financial records" and "corporate proprietary information including trade secrets."[4] The Response contains highly confidential commercial and financial information related to AMBT's California LifeLine operations. This confidential information includes non-public details about the impact of the CD's actions on the Company's financial and operational status and the Company's plans for addressing those impacts. The Response also discusses non-public aspects of AMBT's LifeLine operations including the terms of its arrangements with third parties and the identification of vendors that AMBT has chosen to perform certain services.

The provision of wireless telecommunications services, including California LifeLine services, is a competitive market. As such, disclosure of the described confidential information in the Response would cause the Company competitive harm by unfairly allowing competitors to have access to confidential and proprietary information regarding AMBT's financial and operational information, how AMBT provides services, and the terms of AMBT's contracts with

[3] Cal. Gov't Code § 7927.705.

[4] Cal. Gov't Code § 7927.605.

third parties. Moreover, AMBT has not disclosed confidential information to any unauthorized third party. Furthermore, the confidential information contained in the Response is not part of the public record in any jurisdiction.

Second, the identified confidential information in the Response is exempted from mandatory disclosure under "Exemption 4" of the federal Freedom of Information Act (FOIA).[5] FOIA Exemption 4 allows the withholding of commercial or financial information that is privileged or confidential. The confidentiality requirement is satisfied when commercial or financial information is "customarily and actually treated as private by its owner and provided to the government under an assurance of privacy."[6] As explained above, the Response includes highly confidential commercial and financial information regarding how AMBT operates its business, including its plans regarding future operations and its relationships with third parties. Public disclosure of such information would harm the Company's ability to compete. Moreover, the Company treats the confidential information contained in the Response as private.

Finally, Section 583 of the California Public Utilities Code provides that no information furnished to the Commission "except those matters specifically required to be open to public inspection by this part, shall be open to public inspection or made public except on order of the commission …."[7] There is no California law that requires highly confidential information about how a wireless carrier conducts its business to be open to public inspection.

In the event that any person or entity requests disclosure of the identified confidential information, please notify counsel for AMBT at the email addresses below in order to permit the

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[5] *See* 5 U.S.C. § 552(b)(4) (stating public disclosure is not required for "trade secrets and commercial or financial information obtained from a person and privileged or confidential").

[6] *Food Mktg. Inst. v. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019).

[7] Cal. Pub. Util. Code § 583.

Company to oppose such a request or take such other action to safeguard its interests as it deems necessary.

Based on the foregoing reasons, AMBT respectfully requests that the Commission grant this Motion seeking to designate the portions of the Response identified herein as confidential and filed under seal.[8]

Respectfully submitted,



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Counsel for American Broadband and Telecommunications Company LLC

November 19, 2026

[8] In accordance with Rule 11.4, a proposed ruling that indicates the relief requested is attached to this Motion.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of American Broadband and Telecommunications Company LLC (U-4457-C) for Appeal Request for Expedited Schedule	A.2606003 (Filed May 15, 2026)

[PROPOSED] ORDER

Having reviewed the Motion of American Broadband and Telecommunications Company LLC (AMBT) for an order allowing it to file under seal the confidential version of the Response to Request for Additional Information Related to the Motion for Preliminary Injunction, filed November 19, 2026, and good cause appearing,

IT IS HEREBY ORDERED that AMBT's Response to Request for Additional Information Related to the Motion for Preliminary Injunction will be filed under seal.

Dated: _____ By: _____
Administrative Law Judge

Docusign Envelope ID: CB7ED7DA-DBC0-859C-8139-F9B04BCAF83C

DECLARATION OF JEFFREY ANSTED

In support of the Motion for Leave to File under Seal filed with the California Public Utilities Commission by American Broadband and Telecommunications Company LLC (AMBT or Company), Jeffrey Ansted states as follows:

1. My name is Jeffrey Ansted. I am President of AMBT. My personal knowledge of the facts stated herein has been derived from my employment with AMBT.

2. On November 19, 2026, AMBT filed a Response to Request for Additional Information Related to the Motion for Preliminary Injunction (Response).

3. AMBT considers the information identified in the Response to be confidential commercial and financial information and protected from disclosure pursuant to Section 7927.605 of the California Government Code, Section 583 of the California Public Utilities Code, and 5 U.S.C. § 552(b)(4).

4. AMBT treats the confidential information contained in the Response as private and has not disclosed it to any unauthorized third party.

5. I have reviewed AMBT's Motion for Leave to File under Seal. On behalf of AMBT, I verify that the information contained in Motion for Leave to File under Seal is true and accurate to the best of my personal knowledge.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this Declaration are true and correct.

Executed on 11/19/2026

Signed by:
Jeffrey Ansted
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Jeffrey Ansted
President