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Attorneys for CSC TKR, LLC

IN THE MATTER OF THE JOINT PETITION OF
CSC TKR, LLC AND SERVICE ELECTRIC CABLE
T.V. OF NEW JERSEY, INC. FOR THE APPROVAL
OF THE TRANSFER OF CERTIFICATES OF
APPROVAL OF SERVICE ELECTRIC CABLE T.V.
OF NEW JERSEY, INC.

:
:
: **AFFIDAVIT OF**
: **PAUL JAMIESON**
:

BPU Docket No. CM20030211

STATE OF NEW YORK :
: **ss:**
COUNTY OF NASSAU :

I, PAUL JAMIESON, being of full age, being duly sworn, deposes and says:

I am Vice President, Government Affairs, for CSC TKR, LLC (hereinafter “Buyer” or “the Company”). I am familiar with the information contained in the amended petition and exhibits thereto (hereinafter the Amended Petition) in the above-captioned matter. If called as a witness, I could and would testify competently to the same.

1. This affidavit supplements my affidavits dated March 5, 2020 and March 18, 2020 regarding certain confidential information set forth in the Company’s filings with the board in this matter. Specifically, this supplemental affidavit substantiates the Company’s request that certain information set forth in Exhibit F to the Amended Petition receive confidential treatment in accordance with the board’s regulations. Said information was not provided with the original filing in this matter.

2. A fully redacted version of Exhibit F was filed with the Board's Office of the Secretary in accordance with the Board's regulations. The confidential version of Exhibit F was filed with the Board's Office of Cable Television and Telecommunications.

3. Exhibit F sets forth certain confidential data as follows:

- Number of plant miles (aerial and underground), fiber optic miles and fiber nodes;
- The cost of acquisition and the cost and nature of improvements to the system; and
- The value of the property carried on the books.

4. The above information involves sensitive trade secret and proprietary financial information regarding operations and assets that directly relate to the Seller's and Buyer's operations (hereinafter the "Confidential Proprietary Information). Disclosure of the Confidential Proprietary Information would allow a competitor to analyze Seller's financial position, thereby permitting it to ascertain business strategies. Thus, a competitor could use much of the Confidential Proprietary Information to analyze both costs of providing service in specific areas in New Jersey and judge the financial condition of the Buyer and Seller. This insight would allow it to develop strategies for marketing, investment and/or construction purposes.

5. Armed with an understanding of Seller's assets in a specific geographic, a competitor would be able to target cable markets segments and set pricing models for its own customer packages, thereby gaining a competitive advantage. In contrast, Buyer would not have similar knowledge of its competitor's operations. Therefore, analysis of the Confidential Proprietary Information would be of great benefit to competitors.

6. It is clear information providing details on the operations and technical features of the Seller's systems should never be released to the general public. This information directly relates to

operations of a private company, which should not be provided to individuals that may be in position to damage Buyer's reputation or competitive position.

7. To my knowledge, the above referenced confidential information has not been routinely divulged to the general public. The Buyer and Seller will be taking precautions to make sure that the Confidential Information does not enter the public domain.

8. Maintaining the confidentiality of the above-referenced redacted information will not harm the public.

9. In view of the foregoing, it is clear the information referenced herein is proprietary commercial information, which is confidential and if disclosed, would give competitors an undue competitive advantage that would have a significant adverse impact on Buyer's future financial position. For the reasons outlined above, continued confidential treatment for at least five years from the date of this affidavit is required.



Paul Jamieson

Sworn before me this
3rd day of April 2020

Samantha Pardal

Notary Public

SAMANTHA M. PARDAL
Notary Public, State of New York
No. 01PA6275026
Qualified in Nassau County
Commission Expires: January 14, 2021

