

NORRIS McLAUGHLIN, PA
A Professional Corporation
400 Crossing Boulevard, 8th Floor
P.O. Box 5933
Bridgewater, New Jersey 08807-5933
(908) 722-0700
Attorneys for Petitioner, CSC TKR, LLC

**STATE OF NEW JERSEY
BOARD OF UTILITIES**

IN THE MATTER OF THE APPLICATION OF : **DOCKET NO.**
CSC TKR, LLC FOR RENEWAL OF A :
CERTIFICATE OF APPROVAL TO CONTINUE :
TO OPERATE AND MAINTAIN A CABLE : **AFFIDAVIT**
SYSTEM IN THE TOWNSHIP OF :
FRELINGHUYSEN, COUNTY OF WARREN, :
STATE OF NEW JERSEY :

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

AFFIDAVIT OF PAUL JAMIESON

I, **PAUL JAMIESON**, being first duly sworn according to law, hereby depose and say that:

1. I am Vice President, Government Affairs & Policy for CSC TKR, LLC (hereinafter "Altice"). I am familiar with, among other things, operational, technical, and business issues relating to the planning, development, and implementation of Altice's business in New Jersey. If called as a witness, I could and would testify competently to the same.

2. I submit this affidavit in support of Altice's request for confidential and proprietary treatment of the System Map included as Appendix II to Altice's Application for a

Cable Television Franchise Renewal and as **Exhibit D** to the Verified Petition for a Renewal of a Certificate of Approval (hereinafter “System Map”) filed on or about December 14, 2022 with the Board of Public Utilities and sent by email to the Office of Cable Television & Telecommunications on even date.

3. The System Map depicts information relating to Altice’s network, system design and infrastructure, and plant information. This information is sensitive information and not available to the public. Altice is concerned that release of this commercially sensitive information could jeopardize its infrastructure and allow access by competitors and, for this reason, is providing the System Map as a confidential document.

4. Information as described in the preceding paragraph is highly confidential and proprietary in nature. Armed with knowledge of the data set forth therein, infrastructure could be targeted for sabotage by a bad actor(s) and/or a competitor could develop targeted market and investment strategies, including plans that could have a detrimental impact on Altice’s competitive position. Therefore, public disclosure of the System Map would be dangerous, and/or of benefit to Altice’s competitors because of its inherent commercial value, causing a potential substantial detrimental impact on Altice’s financial position.

5. To my knowledge, the System Map has not been made available to the public or contained in materials which are routinely available to the general public. Altice will take precautions to make sure that this document does not enter the public domain.

6. Maintaining the confidentiality of the System Map will not harm the public.

7. To the best of my knowledge, neither the Board nor any other state or Federal agency or court of competent jurisdiction has previously made a confidentiality determination relevant to the pending confidentiality claim.

8. In view of the foregoing, it is appropriate for the Board to limit access to such information. The confidential information being provided is for the use of the Board in exercising its governmental functions. There is no legitimate purpose to be served in disclosing this proprietary material to Altice's competitors or, indeed, to any person other than the appropriate staff of the Board.

I hereby affirm that the foregoing is true and correct to the best of my knowledge.



Sworn to and subscribe before
me this 13th day of
December, 2022



Notary Public

ROBERT MOCH
NOTARY PUBLIC, STATE OF NEW YORK
NO. 02HO6002764
QUALIFIED IN WESTCHESTER CO.
COMMISSION EXPIRES FEB. 17 2026