## NORRIS McLAUGHLIN, PA

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CSC TKR, LLC D/B/A

CABLEVISION OF MORRIS

FRANCHISE RENEWAL

IN JEFFERSON TOWNSHIP : AFFIDAVIT OF PAUL JAMIESON

**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 d/b/a Cablevision of Morris (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 as referenced in the above-captioned matter (hereinafter "System Map").

- 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, no 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 to limit access to such information. The confidential information being provided is for the use of the municipality 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 representatives of the municipality.

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

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Sworn to and subscribe before me this 8th day of

March, 2023

Notary Public NOTARY PUBLIC, STATE OF NEW YORK NO. 02H06002764

QUALIFIED IN WESTCHESTER CO. COMMISSION EXPIRES FEB. 17 2026