

THE BISON JACOBSON FIRM LLC

6605 LONGSHORE STREET

SUITE 240 #202

DUBLIN, OHIO 43017

TELEPHONE: 513-235-2051

FACSIMILE: 888-965-0577

E-MAIL: BBJACOBSON@BISONJACOBSON.COM

June 21, 2019

VIA ELECTRONIC SUBMISSION

Director of Administration
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, OH 43215-3793
(614) 466-3016

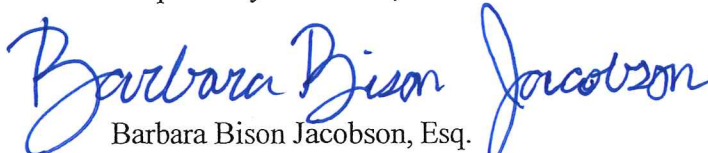
Re: IRU Networks, LLC
Motion for Protective Order
Case No. 19-1350-TP-ACE

Dear Sir/Madam:

In connection with the above case number, attached please find for filing IRU Networks, LLC's Motion for Protective Order to protect the confidentiality of its financial information submitted as **Exhibit H** to its Application for a Certificate of Public Convenience and Necessity to Provide Resold Local and Interexchange Services in the State of Ohio.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,



Barbara Bison Jacobson, Esq.
Attorney for IRU Networks, LLC

Enclosures

cc: Donna Rice Costello

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
IRU Networks, LLC)
To Provide Resold Local and Interexchange Services) Case No. 19-1350-TP-ACE
Throughout the State of Ohio)

MOTION FOR A PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-02(E), IRU Networks, LLC (hereinafter "IRU Networks") respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial information submitted as **Exhibit H** to its Application for a Certificate of Public Convenience and Necessity to Provide Resold Local and Interexchange Services in the State of Ohio.

IRU Networks, LLC is a privately held Limited Liability Company and its financial statements are not part of the public record in any jurisdiction. Further, IRU Networks submits that its financial information constitutes trade secrets under Ohio law, the disclosure of such information would be detrimental to IRU Networks in the competitive telecommunications market as competitors may obtain sensitive financial and business plan information, and non-disclosure of its financial information is consistent with Title 49 of the Ohio Code. Accordingly, IRU Networks requests the Commission treat **Exhibit H** as confidential and not disclose the financial information or any information contained therein to any person not responsible for reviewing its application.

Respectfully submitted,

IRU Networks, LLC

By: 

Barbara Bison Jacobson, Esq.
The Bison Jacobson Firm LLC
6605 Longshore Street
Suite 240 #202
Dublin, Ohio 43017
Telephone: (513) 235-2051
Facsimile: (888) 965-0577
Email: bbjacobson@bisonjacobson.com

Its Attorney

Dated: 6/21/19