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A Professional Limited Liability Company

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Monica Borne Haab  
Philip R. Adams, Jr.

January 22, 2007

*Via Overnight Mail*

Rene Jenkins, Chief Clerk  
Ohio Public Utilities Commission  
180 E. Broad Street  
Columbus, OH 43215

RE: Telecom Management, Inc. d/b/a Pioneer Telephone  
Case No. 07-36-TP-ACE

Dear Ms. Jenkins:

Enclosed please find an original and ten (10) copies of the Motion for Protective Order and Memorandum in Support of Protective Order, which was inadvertently omitted from the original filing.

An additional copy of this letter has been enclosed to be date-stamped and returned in the envelope provided as evidence of the filing.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Leon Nowalsky *LN*

LLN/rph  
Enclosure

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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-BOOKETING DIV  
2007 JAN 23 AM 11:02  
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In the Matter of the Application of )  
Telecom Management, Inc. d/b/a )  
Pioneer Telephone for a Certificate of )  
Public Convenience and Necessity to )  
Provide Resold Local Exchange Services )

Case No. 07-36-TP-ACE

**MOTION FOR PROTECTIVE ORDER**

Pursuant to Ohio Administrative Code Chapter 4901-1-24(A)(7) and (D), Telecom Management, Inc., d/b/a Pioneer Telephone ("Pioneer"), through undersigned counsel, respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial information submitted under seal as Exhibit 10 to its Application for a Certificate of Public Convenience and Necessity to Provide Resold Local Exchange Services in Ohio for the reasons set forth in its accompanying memorandum in support of its Motion for Protective Order.

WHEREFORE, Pioneer respectfully requests that the Commission enter an order to protect the confidentiality of its financials in Ohio and that this document not be released to the public.

Respectfully Submitted,



Leon Nowalsky *ish*  
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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of                     )  
Telecom Management, Inc. d/b/a                     )  
Pioneer Telephone for a Certificate of                     )  
Public Convenience and Necessity to                     )  
Provide Facilities-Based and Resold                     )  
Local Exchange Services                     )

Case No. 07-36-TP-ACE

**MEMORANDUM IN SUPPORT OF  
MOTION FOR PROTECTIVE ORDER**

Pursuant to Ohio Administrative Code Chapter 4901-1-24(A)(7), Telecom Management, Inc. d/b/a Pioneer Telephone ("Pioneer") respectfully requests that the Ohio Public Service Commission enter an Order to protect the confidentiality of its financials submitted under seal as Exhibit 10 to its Application for a Certificate of Public Convenience and Necessity to Provide Resold Local Exchange Services in Ohio.

Pioneer submits that this exhibit contains trade secret information protected under Ohio Law. In determining whether information is a "trade secret," the Ohio Supreme Court "examines: (1) whether the information is otherwise known or available; (2) what precautions [Pioneer] used to guard the secrecy of the information; (3) the value of the information among [Pioneer's] competitors; (4) the time and effort expended to obtain the claimed secret; (5) the time and effort others would expend to otherwise get the information; and (6) whether [Pioneer] treated the information as confidential. The information for which Pioneer seeks protection satisfies each of these factors. Pioneer does not normally disclose information regarding its accounting system. Pioneer treats such information as confidential and has implemented internal policies and procedures to ensure that such information is not publicly disclosed. Pioneer further asserts that this information could and would

be utilized by Pioneer's competitors to the detriment of Pioneer and Ohio consumers. Pioneer has obtained protective seals for their financial information in an application filed in the state of Connecticut, and has requested protective financial treatment in applications pending in the states of Georgia and Texas. Therefore, Pioneer requests that the Commission accord this information proprietary and confidential treatment and not release it to the public.