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In the Matter of the Application of
Bandwidth.com CLEC, LLC
for a Certificate of Public Convenience and
Necessity to Provide Facilities-Based and Resold)
Local Exchange and Interexchange
Telecommunications Services

Case No. <u>07 -200 TP- ACE</u>

MOTION FOR PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-24, Bandwidth.com CLEC, LLC ("Bandwidth") respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial statements submitted under seal as Exhibit F to its Application for a Certificate of Public convenience and Necessity to Provide Facilities-Based and Resold Local Exchange and Interexchange Services in Ohio for the reasons set forth in its accompanying memorandum in support of its motion for protective order.

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

Respectfully Submitted,

William B. Wilhelm, Jr

Harry N. Malone

Bingham McCutchen LLP

3000 K St., NW

Suite 300

Washington, DC 20007 Tel: (202) 424-7500

Fax: (202) 424-7647

Dated: February 27, 2007

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)		
Bandwidth.com CLEC, LLC)		
for a Certificate of Public Convenience and)	Case No.	 TP-
Necessity to Provide Facilities-Based and Resold)		
Local Exchange and Interexchange)		
Telecommunications Services	ĺ		

MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-24(A)(7), Bandwidth respectfully requests that the Ohio Public Services Commission enter an Order to protect the confidentiality of its financial statements submitted under seal as Exhibit F to its Application for a Certificate of Public Convenience and Necessity to Provide Facilities-Based and Resold Local Exchange and Interexchange Telecommunications Services in Ohio.

Bandwidth submits that this exhibit contains confidential and proprietary information that is protected from disclosure by Ohio law. Bandwidth has attached its non-public financial statements as Exhibit F. Therefore, Bandwidth financial statements are not filed with the SEC or in any other way available to the public. Public disclosure of the projected financial statements would be extremely detrimental to Bandwidth and could be used by Bandwidth's competitors to gain a competitive advantage in the marketplace. Therefore, pursuant to Section 4901-1-24 of the Ohio Administrative Code, Bandwidth requests that the Commission accord this information proprietary and confidential treatment and not release it to the public.

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