

FILE

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
The Ohio Bell Telephone Company dba	)	
AT&T Ohio for Approval of an	)	Case No. 07-1312-TP-BLS
Alternative Form of Regulation of Basic	)	
Local Exchange Service and Other Tier 1	)	
Services Pursuant to Chapter 4901:1-4,	)	
Ohio Administrative Code.	)	

PUCO

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**MOTION FOR PROTECTIVE ORDER  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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Intervenor the Office of the Ohio Consumers' Counsel ("OCC"),<sup>1</sup> on behalf of residential utility consumers, submits this Motion for Protective Order ("Motion"), pursuant to the Public Utilities Commission of Ohio's ("PUCO's") rules in Ohio Adm. Code 4901-1-02(E), 4901-1-12 and 4901-1-24.<sup>2</sup> Concurrently with this Motion, OCC is filing a Reply to AT&T Ohio's memorandum contra in this proceeding. OCC's Reply contains information asserted by AT&T Ohio to be confidential.<sup>3</sup>

OCC might not agree with AT&T Ohio regarding the confidential nature of all of the protected information contained in the Reply, and OCC makes no concession in that regard. Nevertheless, OCC is taking this step consistent with the terms of the protective agreement to ensure that, under the PUCO's rules, the information is protected under seal

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<sup>1</sup> OCC was granted intervention by Entry dated January 17, 2008.

<sup>2</sup> The January 17 Entry also granted AT&T Ohio's motion for a protective order covering allegedly confidential information AT&T Ohio filed with the Application.

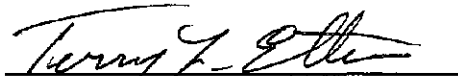
<sup>3</sup> OCC obtained the information through a protective agreement with AT&T Ohio.

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pursuant to AT&T's claim of confidentiality. OCC, however, reserves the right to challenge the confidentiality of any and all information that AT&T Ohio asserts to be confidential.

Respectfully submitted,

JANINE L. MIGDEN-OSTRANDER  
CONSUMERS' COUNSEL

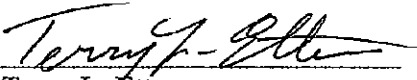
A handwritten signature in cursive script, appearing to read "Terry L. Etter", is written over a horizontal line.

Terry L. Etter, Counsel of Record  
David C. Bergmann  
Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**  
10 West Broad Street, Suite 1800  
Columbus, Ohio 43215-3485  
(614) 466-8574 (Telephone)  
[etter@occ.state.oh.us](mailto:etter@occ.state.oh.us)  
[bergmann@occ.state.oh.us](mailto:bergmann@occ.state.oh.us)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Protective Order by the Office of the Ohio Consumers' Counsel was provided to the persons listed below electronically and via first class U.S. Mail, postage prepaid, this 26<sup>th</sup> day of February 2008.

  
Terry L. Etter  
Assistant Consumers' Counsel

**THOMAS LINDGREN**  
**STEVE REILLY**  
Ohio Attorney General's Office  
Public Utilities Section  
180 East Broad Street, 9<sup>th</sup> Floor  
Columbus, Ohio 43215-3793  
thomas.lindgren@puc.state.oh.us  
stephen.reilly@puc.state.oh.us

**JON F. KELLY**  
**MARY RYAN FENLON**  
AT&T Ohio  
150 East Gay Street  
Columbus, Ohio 43215  
[jk2961@att.com](mailto:jk2961@att.com)  
[mf1842@att.com](mailto:mf1842@att.com)