

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Frontier)
North, Inc. For a Determination Pursuant to) Case No. 90-5023-TP-TRF
Ohio Revised Code 4927.13 (D)) 11-4515-TP-ATA
)

MOTION FOR A PROTECTIVE ORDER

Frontier North Inc., by its attorneys, and pursuant to Sections 4901-1-24(D), 4901:1-4-09(E) moves for a protective order keeping confidential the designated confidential and/or proprietary information included in Exhibit 1 in its Application for a Determination Pursuant to Ohio Revised Code 4927.13 (D). The reasons underlying this motion are detailed in the attached Memorandum in Support. Consistent with the requirements of Section 4901-1-24(D) of the Commission's rules, three unredacted copies of the confidential information which is the subject of this motion have been filed under seal.

Respectfully submitted,

FRONTIER NORTH INC.



Kevin Saville
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Its Attorney

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MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER

Frontier North Inc. requests that certain information described below and used in support of its Application in this case be considered as confidential and/or proprietary and be protected from public disclosure. In support of its Application herein, Frontier North, Inc. is providing confidential information regarding the number of access lines and the number of customers receiving Lifeline service in Exhibit 1 in Case No. 11-4515-TP-ATA, Frontier North's Application for a Determination Pursuant to Ohio Revised Code 4927.13 (D) of the Ohio Revised Code. Division (D) of Rule 4901-1-24 provides that the Commission or certain designated employees may issue an order which is necessary to protect the confidentiality of information contained in documents filed with the Commission's Docketing Division to the extent that state or federal law prohibits the release of the information and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code. As set forth herein, the information described below represents confidential business information and, therefore, should be protected from disclosure.


The confidential information consists of: (1) the total number of access lines; and (2) the total number of Lifeline customers as well as the resulting revenue losses attributable to Lifeline discounts. Frontier does not normally disclose the preceding information and considers and has treated the information as a trade secret. In the ordinary course of business this information is stamped confidential, is treated as proprietary and confidential by Frontier employees, and is not disclosed to anyone except in a Commission proceeding or pursuant to a staff data request.

The Commission has facilitated the protection of trade secrets in Ohio Administrative Code Rule § 4901-1-24 (A)(7). Therefore, Frontier requests that the Commission accord this information proprietary and confidential treatment and not release it to the public.

For these reasons, Frontier North, Inc. requests that the Commission enter a protective order, allowing Frontier North, Inc. to file the proprietary data supporting its Application in this matter under seal, affording the maximum confidentiality protection available.

Respectfully submitted,

FRONTIER NORTH INC.

A handwritten signature in black ink that reads "Kevin Saville". The signature is written in a cursive, flowing style.

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**EXHIBIT 1 - Case No. 90-5023-TP-TRF
11-4515-TP-ATA**

A	B	C	D	E	F
Month	Total Access Line Count (Res.; non-res; payphone access)	Total lifeline Customers	Total Non-Lifeline Customers	Total Unreimbursed Lifeline Discount (\$3.50 per customer)	Per month breakdown of surcharge per non-lifeline customer
1					
2					
3	Apr-11				0.165132953
4	May-11				0.164358755
5	Jun-11				0.162530764
6					
7					
8	3-Month Average				
9	Month:				0.16401545
10					
11					
12					
13					
14					
15					
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Case No(s). 11-4515-TP-ATA

Summary: Motion For Protective Order and Memorandum of Support electronically filed by Ms. Rachel G Winder on behalf of Frontier Communications