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VIA OVERNIGHT COURIER

September 5, 2019

Barcy McNeal, Commission Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793
Attention: Docketing Division

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RECEIVED-DOCKETING DIV

RE: Case No. 19-1743-TP-ACE

**Hudson Fiber Network Inc. Application to Provide Telecommunications Services
Throughout the State of Ohio**

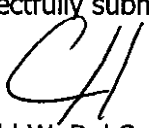
**Motion for Protective Order to File Confidential Information Under Seal and
Confidential Exhibits**

Dear Secretary McNeal:

Enclosed for filing are an original and two (2) copies of Hudson Fiber Network Inc.'s Motion for Protective Order with three (3) unredacted copies of Exhibit H-2 to the above referenced application. The Application was electronically filed today.

Please date-stamp the extra copy of this filing and return it in the envelope provided. Should you have any questions concerning this filing, please do not hesitate to contact Stephany Fan at 202-373-5441 or Christian Hoefly at 202-739-5469.

Respectfully submitted,


Ronald W. Del Sesto, Jr.
Stephany Fan
Christian Hoefly

On behalf of Hudson Fiber Network Inc.

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EXHIBIT H-1

Motion for Protective Order

Application of
Hudson Fiber Network Inc.
for a Certificate of Public Convenience and
Necessity to Provide Telecommunications
Services throughout the State of Ohio

Case No. 19-1743-TP-ACE

Hudson Fiber Network Inc. (“HFN”), by its attorneys and pursuant to OAC 4901-1-24(D), moves for a protective order to prevent public disclosure of the confidential and proprietary financial information included as **Exhibit H-2** in the above-referenced application. In support of this Motion, HFN states as follows:

2. ESI is a privately held company and is not required to file financial information with the United States Securities and Exchange Commission and does not otherwise disclose its financial information to the public.

4. The Confidential Exhibit derives economic value from not being generally known to and not being readily ascertainable by proper means by other person who can obtain economic

value from their disclosure and use. Specifically, the information contained therein is extremely sensitive financial information that could be used by competitors to determine revenue and other information damaging to the Company. Disclosure of such information would be extremely detrimental and could be used by the Company's competitors to materially affect the Company's ability to compete effectively.

5. Due to the sensitive nature of the Confidential Exhibit, it is appropriate for the Commission to limit access to it. The Confidential Exhibit should solely be used by the Commission in exercising its governmental functions in considering HFN's Application. There is no legitimate purpose or public interest to be served in disclosing the Confidential Exhibit to the Company's current or future competitors or to any person other than the appropriate staff of the Commission.

WHEREFORE, Hudson Fiber Network Inc. respectfully requests that the Commission grant a Protective Order allowing **Exhibit H-2** of the Application to be treated as confidential.

Respectfully submitted,



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Counsel for Hudson Fiber Network Inc.

Dated: September 5, 2019