

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV

2008 MAR 24 PM 4: 26

In the Matter of the Application of)
The Ohio Bell Telephone Company dba)
AT&T Ohio for Approval of an) Case No. 08-107-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

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

Intervenor the Office of the Ohio Consumers' Counsel ("OCC"),¹ 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 4901-1-24.² Concurrently with this Motion, OCC is filing an Opposition to AT&T Ohio's Application in this proceeding. OCC's Opposition and attached affidavits contain information asserted by AT&T Ohio to be confidential.³

OCC might not agree with AT&T Ohio regarding the confidential nature of all of the protected information contained in the Opposition and affidavits, and OCC makes no concession in that regard. Nevertheless, OCC is filing this Motion consistent with the terms of the protective agreement to ensure that, under the PUCO's rules, the information is protected under seal pursuant to AT&T's claim of confidentiality. OCC, however,

¹ OCC was granted intervention by Entry dated February 27, 2008.

² The February 27 Entry also granted AT&T Ohio's motion for a protective order covering allegedly confidential information AT&T Ohio filed with the Application.

³ OCC obtained the information through a protective agreement with AT&T Ohio.

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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 dark ink, appearing to read "T. Etter", is written over a horizontal line.

Terry L. Etter, Counsel of Record

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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 this 24th day of March 2008.



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