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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Northeastern ITS, LLC)
for a Certificate of Public Convenience)
and Necessity to Provide Competitive)
Telecommunication Services)

Case No. 09 - 282 - TP - ACE

MOTION FOR A PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-02(E), Northeastern ITS, LLC ("Northeastern") respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial information submitted as Exhibit 4 to its Application for a Certificate of Public Convenience and Necessity to Provide Competitive Telecommunication Services in Ohio.

Northeastern is a privately held corporation and its financial statements are not part of the public record in any jurisdiction. Further, Northeastern submits that its financial information constitutes trade secrets under Ohio law, the disclosure of such information would be detrimental to Northeastern in the competitive telecommunications market as competitors may obtain sensitive financial and business plan information, and non-disclosure of its financial information is consistent with Title 49 of the Ohio Code. Accordingly, Northeastern requests the Commission treat Exhibit 4 as confidential and not disclose the financial information or any information contained therein to any person not responsible for reviewing its application.

Respectfully submitted,



Jennifer P. Bagg

Counsel for:

Northeastern ITS, LLC

Dated: March 26, 2009

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