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BEFORE
THE PUBLIC UTILITY COMMISSION OF OHIO

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In the Matter of the Commission's)
Investigation into Intrastate Carrier) Case No. 10-2387-TP-COI
Access Reform Pursuant to Sub.S.B.162)

MOTION FOR PROTECTIVE ORDER

NOW COMES the respondent, Globalcom Inc dba First Communications (the "Respondent"), by and through its attorney, and submits its Motion for Protective Order in accordance with, among other things, Section 4901-1-24 of the Ohio Administrative Code ("O.A.C.").

In support of this Motion, Respondent first states that Data Response contains confidential and proprietary information the disclosure of which would be detrimental to First Communications, LLC's commercial interests. O.A.C. Section 4901-1-24(7) states:

A trade secret or other confidential research, development, commercial, or other information not be disclosed or be disclosed only in a designated way.

Respondent further states that it is a privately held company, and the commercial and financial information and disclosure set forth in the Data Response is not publicly available information.

In further support of this Motion, Respondent states that its Competitors could obtain economic value from its disclosure or use of such confidential and proprietary information and disclosure would result in a competitive disadvantage to the

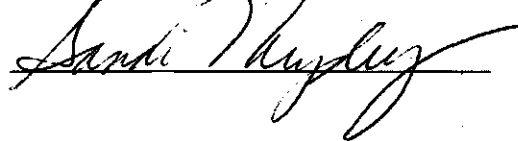
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Respondent's interests and be detrimental to the interests of its stockholders.

CONCLUSION

For the reasons set forth herein, Respondent's Motion for Protective Order should be granted.

Respectively submitted:

A handwritten signature in black ink, appearing to read "Sandi Murphy", written over a horizontal line.

Sandi Murphy (# 0055745)
Senior Vice President and General Counsel
First Communications, Inc
First Telecom Services, LLC
3340 West Market Street
Akron, Ohio 44333
(330) 835-2664
smurphy@firstcomm.com