

March 28, 2011

VIA OVERNIGHT DELIVERY

Renee J. Jenkins
Secretary
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

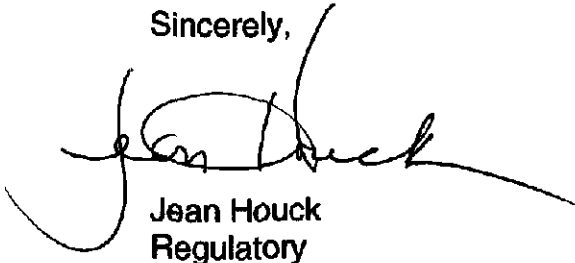
Re: Motion to for Protective Order and Confidential Response to
Request for Revenue Information Case No. 10-2387-TP-COI

Dear Ms. Jenkins:

In response to the Commission's Order issued in the above referenced case enclosed is the original and ten (10) copies of DeltaCom, Inc.'s Motion for Protective Order and the original and three (3) copies its confidential response filed under seal to the Commission's request for revenue information in the above referenced case.

Please acknowledge receipt of this filing by date stamping the enclosed copy of this cover letter labeled "return receipt" and returning it in the enclosed postage paid envelope. If you have any questions regarding this matter please contact me at 256-382-2230.

Sincerely,



Jean Houck
Regulatory

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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)
Access Reform Pursuant to Sub.S.B.162)

Case No. 10-2387-TP-COI

MOTION FOR PROTECTIVE ORDER

NOW COMES the respondent, DeltaCom, Inc. (the "Respondent") pursuant to Rule 4901-1-24 of the Ohio Administrative Code ("O.A.C.") moves for a protective order to keep its responses to Appendix D of the November 3, 2010 Entry confidential and not part of the public record. Consistent with the requirements of OAC Rule 4901-1-24(D), DeltaCom, Inc. has filed under seal three (3) unredacted copies of the confidential exhibit that is subject to this motion.

In support of this Motion, Respondent first states that its Data Response contains confidential and proprietary information, the disclosure of which would be detrimental to DeltaCom, Inc.'s commercial interests. O.A.C. Section 4901-1-27(7) states:

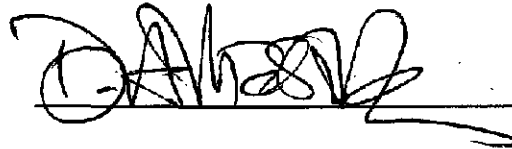
A trade secret or other confidential research, development, commercial, or other information not be disclosed or be discussed only in a designated way.

Respondent further 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 Respondent's interests and be detrimental to the interest 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 'D. Mastando', written over a horizontal line.

D. Anthony Mastando
Vice President, Regulatory Affairs
Senior Regulatory Attorney
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Huntsville, Alabama 35806
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