

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

MOTION FOR A PROTECTIVE ORDER

Frontier North Inc. and Frontier Communications of Michigan, Inc. (collectively "Frontier"), by its attorneys, and pursuant to Sections 4901-1-24(D), 4901: 1-4-09(E); and Finding (6) of the Commission Entry in the above mentioned case filed February 23, 2011, move for a protective order keeping confidential the designated confidential and/or proprietary information included in its Response to the First Data Request of the Public Utilities Commission of Ohio in the referenced case as well as the Revised Response to the First Data Request of the Public Utilities Commission of Ohio in the above referenced case. The reasons underlying this motion are detailed in the attached Memorandum in Support. Consistent with the requirements of Section 4901-1-24(D) of the Commission's rules, three unredacted copies of the confidential information which is the subject of this motion have been filed under seal.

Respectfully submitted,

FRONTIER NORTH INC.
FRONTIER COMMUNICATIONS OF
MICHIGAN, INC.



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MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER

Frontier North Inc. and Frontier Communications of Michigan, Inc. (collectively “Frontier”), request that certain information described below be considered as confidential and/or proprietary and be protected from public disclosure. Finding (6) in Case No. 10-2387-TP-COI of the Commission's February 23, 2011 entry provides that confidential information filed by the ILEC will be eligible for proprietary treatment in according with Section 4901-1-24 of the Commission's rules. Division (D) of that section provides that the Commission or certain designated employees may issue an order which is necessary to protect the confidentiality of information contained in documents filed with the Commission's Docketing Division to the extent that state or federal law prohibits the release of the information and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code. As set forth herein, the information described below represents confidential business information and, therefore, should be protected from disclosure.

The confidential information consists of: (1) total number of access lines by exchange access band rate; (2) intrastate billed demand for each rate element switched access revenues; and (3) total intrastate revenues and uncollectible revenues. Frontier does not normally disclose the preceding information and considers and has treated the information as a trade secret. In the ordinary course of business this information is stamped confidential, is treated as proprietary and confidential by Frontier employees, and is not disclosed to anyone except in a Commission proceeding or pursuant to a staff data request. During the course of discovery, information of this type has generally been provided only pursuant to a protective agreement to ensure that such information is not publicly disclosed. Frontier further asserts that this information could and would be utilized by Frontier’s competitors to the detriment of Frontier. Therefore, Frontier

requests that the Commission accord this information proprietary and confidential treatment and not release it to the public.

In addition, non-disclosure of the identified confidential information will not impair the intent of the investigation in this proceeding. The Commission and its Staff have full access to the information in order to review and investigate carrier access reform. In addition, consistent with the Commission's Entry of February 23, 2011, beginning on March 18, 2011 interested entities will have the opportunity to seek discovery on the submitted data. Therefore, no purpose would be served by the public disclosure of the information.

Respectfully submitted,

FRONTIER NORTH INC.
FRONTIER COMMUNICATIONS OF
MICHIGAN, INC.

A handwritten signature in black ink that reads "Kevin Saville". The signature is fluid and cursive, with the first name "Kevin" and last name "Saville" clearly distinguishable.

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Summary: Motion for protective order and memorandum of support for revised response to 2.23.11 data request electronically filed by Ms. Rachel G Winder on behalf of Frontier Communications