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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of TeleStride, LLC to Provide Competitive Telecommunications Services, Non-IP Local Exchange Voice Service to Nonresidential End Users, and Carrier-to-Carrier Switched Access as a Facilities-Based Competitive Local Exchange Carrier in McClure, Ohio.

Case No. 12-668-TP-ACE

MOTION FOR PROTECTIVE ORDER

TeleStride, LLC ("TeleStride"), by its attorney and pursuant to OAC 4901-1-24(D), moves for a protective order to prevent public disclosure of the confidential and proprietary financial information included as Exhibit D-1 and Exhibit D-2 (the "Confidential Exhibits") in TeleStride's Telecommunications Supplemental Application Form for Carrier Certification. In support of this Motion, TeleStride states as follows:

1. TeleStride is applying for authorization to provide non-Internet Protocol ("non-IP") local exchange voice service to non-BLES end user business customers using circuit mode communications with Time Division Multiplexing ("TDM") as a facilities-based competitive local exchange carrier in McClure, Ohio. TeleStride also is applying for authorization to provide carrier-to-carrier switched access service to interexchange carriers and competitive telecommunications services to end users, such as bundled services and high-capacity telecommunications services. As part of that application, TeleStride provides financial statements as Exhibit D-1 and confidential commercial documents as Exhibit D-2 evidencing funding commitments.

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2. The Commission has previously granted motions for a protective order when the following two criteria are satisfied:¹

(a) the company seeking the protective order is privately held, and

(b) the information for which protective status is sought represents recent historical, contemporaneous, or projected details about the operations and/or finances of the company seeking the protective order that are competitively sensitive and have never previously been made available to the general public or publicly filed with any other agency.

Each of the above criteria has been met in this case with respect to Exhibit D-1 and Exhibit D-2 of the certification application filed by TeleStride.

3. TeleStride is a privately held company whose owners are James Troup and PTel, LP. PTel, LP is also a privately held company. Therefore, neither TeleStride nor PTel, LP are required to file financial information with the United States Securities and Exchange Commission. Nor does TeleStride or PTel otherwise disclose their financial information to the public.

4. TeleStride and PTel use their best efforts to keep and maintain the confidentiality of the Confidential Exhibits. To the best of TeleStride's knowledge, the Confidential Exhibits have not been disclosed or released to the public.

5. The Confidential Exhibits derive economic value from not being generally known to and not being readily ascertainable by proper means by competitors who can obtain economic value from their disclosure and use. Specifically, the information contained therein is extremely sensitive financial information that could be used by competitors to determine revenue and other

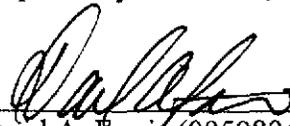
¹ See e.g., *In the Matter of the Application of Zayo Enterprise Networks, LLC, Entry*, Case No. 09-1919-TP-ACE, Dec. 15, 2009.

information damaging to TeleStride. Disclosure of such information would be extremely detrimental and could be used by TeleStride's competitors to materially affect TeleStride's ability to compete effectively.

6. Due to the sensitive nature of the Confidential Exhibits, it is appropriate for the Commission to limit access to them. The Confidential Exhibits should solely be used by the Commission in exercising its governmental functions in considering TeleStride's application. There is no legitimate purpose or public interest to be served in disclosing the Confidential Exhibits to TeleStride's competitors or to any person other than the appropriate staff of the Commission.

WHEREFORE, TeleStride, LLC respectfully requests that the Commission grant a Protective Order protecting the confidentiality of Exhibit D-1 and Exhibit D-2 of TeleStride's application.

Respectfully submitted,



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