## THE BISON JACOBSON FIRM LLC

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April 17, 2012

## **ELECTRONIC FILING**

Betty McCauley Director of Administration Public Utilities Commission of Ohio 180 E. Broad St. Columbus, OH 43215-3793 (614) 466-3016

Re: Q LINK WIRELESS LLC (12-0481-TP-UNC)
Amended Motion for Protective Order

Dear Ms. McCauly,

Attached please find for filing an Amended Motion for Protective Order in Case 12-0481-TP-UNC in the matter of Q LINK WIRELESS LLC's Application for Designation as a Low-Income Competitive Eligible Telecommunications Carrier and protection of Exhibit N to such Application as CONFIDENTIAL.

Exhibit N, the Confidential Document Target, was filed with the Commission on January 30, 2012.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

Barbara Bison Jacobson, Esq. / Attorney for Q LINK WIRELESS LLC

Attachments

cc: Issa Asad

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

	)	
In the Matter of the Application of	)	Case No. 12-0481-TP-UNC
Q LINK WIRELESS LLC	)	
for Designation as a Low-Income Competitive	)	
Eligible Telecommunications Carrier	_ )	

## AMENDED MOTION FOR PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-02(E), Q LINK WIRELESS LLC ("Q LINK" or the "Company") hereby submits this Amended Motion for Protective Order respectfully requesting that the Public Utilities Commission of Ohio ("Commission") enter an Order to protect the confidentiality of its facilities information, which was filed as Exhibit N to its Application for Designation as a Low-Income Competitive Eligible Telecommunications Carrier in Ohio on January 30, 2012 ("Application"). The original Motion for Protective Order was submitted concurrently with the Company's Application. Q LINK filed a withdrawal, without prejudice, of its Application on February 21, 2012. However, the Company maintains that Exhibit N, its facilities information, still warrants confidential protection and treatment by the Commission.

Q LINK is a privately held Limited Liability Company and its facilities information is not part of the public record in any jurisdiction. Further, Q LINK submits that its facilities information constitutes trade secretes under Ohio law, the disclosure of such information would be detrimental to Q LINK in the competitive telecommunications market as competitors may obtain sensitive information regarding the Company's assets, facilities, facilities' locations, operations, and business model. Non-disclosure of its facilities information is consistent with Title 49 of the Ohio Code.

Accordingly, Q LINK requests that the Commission treat Exhibit N as confidential and not disclose the facilities information or any information contained therein to any person not responsible for reviewing its application.

Respectfully submitted,

By:

Q LINK WIRELESS LLC

Dated: April 17, 2012

Barbara Bison Jacobson, Esq.

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Case No(s). 12-0481-TP-UNC

Summary: Motion Amended Motion for Protective Order electronically filed by Angela M. Janssen on behalf of Q Link Wireless LLC