

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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MOTION FOR PROTECTIVE ORDER

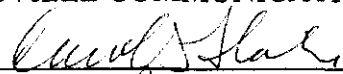
Pursuant to Ohio Adm.Code 4901-1-24(D), Vaughnsville Telephone Company dba Vaughnsville Communications ("Vaughnsville") hereby moves the Commission for a protective order regarding the confidential information that it is filing contemporaneously with this Motion, specifically the unredacted version of its calculations supporting the mandated reductions in its intrastate access rates (the "Confidential Information"). Specifically, Vaughnsville seeks to protect its FY 2011 Intrastate Demand figures (the "MOU") and related revenues derived from the MOU.

Vaughnsville requests that the Commission issue such order as is necessary to protect the Confidential Information. Non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code because the Commission and its Staff will have full access to the Confidential Information in order to fulfill their statutory obligations.

The bases for this Motion may be found in the attached Memorandum of Support.

Respectfully submitted,

VAUGHNSVILLE TELEPHONE COMPANY dba
VAUGHNSVILLE COMMUNICATIONS


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**MEMORANDUM IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER**

In accordance with the Commission's March 20, 2012 Entry in this proceeding, Vaughnsville is concurrently filing its calculations supporting the mandated reductions to its intrastate access rates. One element of the calculations is Vaughnsville's FY 2011 Intrastate Demand (the "MOU"), which Vaughnsville considers to be confidential and proprietary data. Further, the calculations include related revenue information that is derived from the MOU (together, the MOU and the related derived revenues shall be referred to herein as the "Confidential Information"). Because Vaughnsville considers the MOU and derived revenues to be confidential, the unredacted version of the calculations has been filed under seal as required by Ohio Adm.Code 4901-1-24(D).

The Confidential Information includes detail about Vaughnsville's finances that would be of significant interest to competitors. Consequently, that data constitutes confidential information that should not be disclosed in the public record.

The Confidential Information constitutes trade secrets as defined in Revised Code §1333.61(D). The information (1) derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use, and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

The Ohio Supreme Court adopted six factors to be used in determining whether a trade secret claim meets the statutory definition:

- 1) The extent to which the information is known outside the business;

- 2) The extent to which it is known to those inside the business, i.e., by the employees;
- 3) The precautions taken by the holder of the trade secret to guard the secrecy of the information;
- 4) The savings effected and the value to the holder in having the information as against competitors;
- 5) The amount of effort or money expended in obtaining and developing the information; and
- 6) The amount of time and expense it would take for others to acquire and duplicate the information.

State ex rel. The Plain Dealer v. Ohio Dept. of Ins., 80 Ohio St.3d 513, 524-525 (1997).

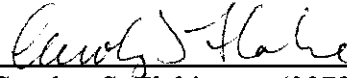
With the exception of Vaughnsville's billing vendor, the Confidential Information is not known outside of Vaughnsville and is known within Vaughnsville only to senior managers and a limited number of employees with a particular need to know. Vaughnsville has taken precautions to guard the secrecy of the Confidential Information by limiting its dissemination. Disclosure of the Confidential Information would harm Vaughnsville's competitive position in the marketplace. (See attached Affidavit of Marty Kaplan, Secretary/Treasurer.)

The protection of trade secret information from public disclosure is consistent with the purposes of Title 49 because the Commission and its Staff have access to the information. Granting protection of the Confidential Information requested herein will not impair the Commission's regulatory responsibilities.

Confidential treatment of the calculations is therefore both appropriate and required by Ohio law and the Commission's rules. For the foregoing reasons, Vaughnsville prays that its Motion for Protective Order be granted.

Respectfully submitted,

VAUGHNSVILLE TELEPHONE COMPANY dba
VAUGHNSVILLE COMMUNICATIONS



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Its Counsel

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AFFIDAVIT OF MARTY KAPLAN

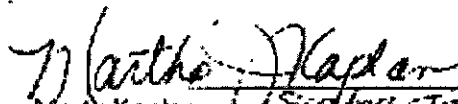
STATE OF OHIO

COUNTY OF PUTNAM

NOW COMES Marty Kaplan, being first duly cautioned and sworn, deposes and says as follows:

1. I am Secretary/Treasurer of Vaughnsville Telephone Company ("Vaughnsville"); P.O. Box 127, Vaughnsville, OH 45893. I am authorized to make this Affidavit on behalf of Vaughnsville, and do so in the ordinary discharge of my responsibilities.
2. I have personal knowledge of all relevant matters pertaining to the calculations that Vaughnsville filed with the Public Utilities Commission of Ohio on April 18, 2012, including the MOU and related revenue data.
3. Vaughnsville considers the MOU and related revenue data (together, the "Confidential Information") to be confidential.
4. The Confidential Information is not otherwise available to the general public, and includes detail about Vaughnsville's finances that would be of significant interest to competitors. Consequently, Vaughnsville is requesting that the Confidential Information not be disclosed to the public.
5. The Confidential Information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means, by other persons who can derive economic value from its disclosure or use.

6. With the exception of Vaughnsville's billing vendor, the Confidential Information is provided only to Vaughnsville's senior management and a restricted list of employees who have a particular need to know the Information.
 7. The Confidential Information is indicative of Vaughnsville's operations and, therefore, public disclosure of the Confidential Information would place Vaughnsville at a competitive and economic disadvantage.
 8. The Confidential Information is the subject of efforts by Vaughnsville that are reasonable under the circumstances to maintain its secrecy.
- FURTHER AFFIANT SAYETH NAUGHT.


Morty Kaplan Secretary-Treasurer

Sworn to before me and subscribed in my presence this 18 day of April, 2012.


Notary Public



KIMBERLY D. YOUNG
Notary Public, State of Ohio
My Commission Expires
Sept. 30, 2012

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing was served via electronic mail to the persons listed below this 18th day of April, 2012.

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