

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

IN RE:

Application of
Local Access LLC
to Provide Facilities-Based and Resold
Local Exchange, Interexchange,
Telecommunications Services
within the State of Ohio

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Docket No.

13-1215-TP-ACC

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MOTION FOR PROTECTIVE ORDER FOR
FINANCIAL STATEMENTS OF LOCAL ACCESS LLC

1. Local Access LLC ("Local Access"), through its undersigned counsel and pursuant to section 4901-1-24 of Public Utility Commission of Ohio's ("Commission") rules respectfully requests that the Commission grant protection from public disclosure and afford confidential treatment to its financial statements and other evidence of financing (collectively, "Financial Statements"), attached as **Exhibit D** to its Application to Provide Facilities-Based and Resold Local Exchange, and Interexchange Service. Local Access requests that the Commission afford the highest level of protective treatment to its Financial Statements and that they be made available only to the Commission.

2. **Exhibit D** sets forth the details of its financing and funding. The information contained in **Exhibit D** is competitively sensitive, proprietary, and confidential. The details of the Local Access's financials are not known to Local Access's competitors, and this type of information is not ordinarily disclosed in the industry.

3. Local Access is a privately held corporation, and accordingly is not required to make public disclosure of its financial statements.

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4. Disclosure would have adverse competitive consequences for Local Access.

Absent protection from disclosure, Local Access's competitors would have access to sensitive financial data and proprietary information. Because Local Access is operating in a highly competitive market, public availability of this information will disadvantage Local Access to the benefit of its competitors. Release of this information to the public would cause unfair economic damage and substantially harm Local Access's ability to compete in the marketplace.

5. Protecting these Financial Statements from disclosure would not affect the public interest. Protecting the Financial Statements from disclosure in no way restricts interested parties from having access to the administrative hearing process. Furthermore, the harm that would result from disclosure of this information far outweighs the public interest in the details of the transaction set forth in the Financial Statements.

6. Accordingly, and for the foregoing reasons, Local Access respectfully requests that the Commission afford confidential treatment to *Exhibit D* of its Application to Provide Facilities-Based and Resold Local Exchange and Interexchange Service.

Respectfully submitted,



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May 16, 2013