

RECEIVED-DOCKETING DIV
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of)
Cincinnati Bell Telephone Company For)
Approval Of A Retail Pricing Plan Which)
May Result In Future Rate Increases)

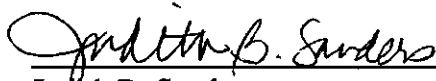
Case No. 96-899-TP-ALT

**MOTION FOR PROTECTIVE ORDER
OF AT&T COMMUNICATIONS OF OHIO, INC.,
CORECOMM NEWCO, INC. AND MCImetro ACCESS
TRANSMISSION SERVICES, INC**

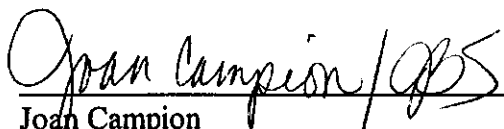
Now comes AT&T Communications of Ohio, Inc. ("AT&T"), CoreComm Newco, Inc. ("CoreComm") and MCImetro Access Transmission Services, Inc. ("MCIm") [hereinafter "Joint Interveners"] pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, hereby move for a protective order to preserve the confidentiality of certain information contained in the joint application for rehearing filed on December 6, 1999. An unredacted version of the application has been submitted under seal and the redacted version has been filed with docketing. The basis for this motion is set forth in the accompanying memorandum.

WHEREFORE, the Joint Interveners respectfully request that their motion be granted.

Respectfully submitted,

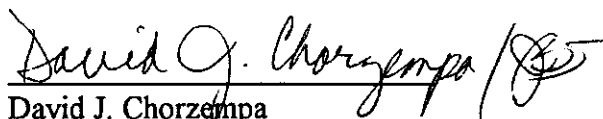


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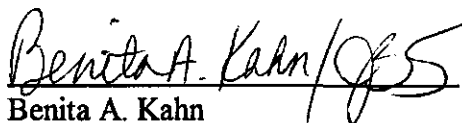
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter Of The Application Of)	
Cincinnati Bell Telephone Company For)	
Approval Of A Retail Pricing Plan Which)	Case No. 96-899-TP-ALT
May Result In Future Rate Increases)	

**MEMORANDUM IN SUPPORT OF THE
MOTION FOR PROTECTIVE ORDER
OF AT&T COMMUNICATIONS OF OHIO, INC.,
CORECOMM NEWCO, INC. AND MCImetro ACCESS
TRANSMISSION SERVICES, INC**

On December 6, 1999 the Joint Interveners filed an application for rehearing in this proceeding. Unfortunately, copies of the document which contained information considered to be confidential by Cincinnati Bell Telephone Company (CBT) was placed onto the public record. Concurrently with the filing of this motion, the Joint Interveners have made arrangements for the withdrawal of the documents from the public record and a substitution of redacted copies of the application for rehearing. The Joint Interveners hereby request that they permitted to place the proprietary version of the document under seal and subject to protective treatment pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code.

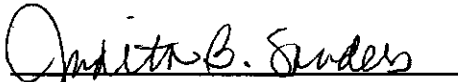
Rule 4901-1-24(D), Ohio Administrative Code, provides, in pertinent part, as follows:

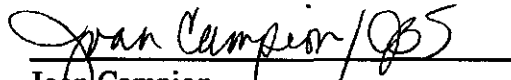
(D) Upon motion of any party or person filing a document with the commission's docketing division relative to a case before the commission, the commission, the legal director, the deputy legal director, or the attorney examiner assigned to the case may issue any

order which is necessary to protect the confidentiality of information contained in the document, to the extent that state or federal law prohibits release of the information, including where the information is deemed by the commission, the legal director, or the attorney examiner assigned to the case to constitute a trade secret under Ohio law, and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code. Any order issued under this paragraph shall minimize the amount of information protected from public disclosure. . . .

WHEREFORE, the Joint Interveners respectfully request that the confidential, unredacted version of the application for rehearing inadvertently filed on the public record in this docket on December 6, 1999 be granted protected status and that the Commission grant its motion for a protective order.

Respectfully submitted,


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**ATTORNEYS FOR CORECOMM
NEWCO, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Protective Order has been served upon the following by electronic mail, Federal Express or first class U. S. Mail, postage prepaid, this 10th day of December, 1999.


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