

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

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|---------------------------------------|---|-------------------------|
| In the Matter of the Application of   | ) |                         |
| Global Connection Inc. of America dba | ) | Case No. 12-2253-TP-UNC |
| STAND UP WIRELESS for Designation     | ) |                         |
| as a Low-Income Competitive           | ) |                         |
| Eligible Telecommunications Carrier   | ) |                         |

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**MOTION FOR EXTENSION OF PROTECTIVE ORDER**

Pursuant to Ohio Administrative Code § 4901-1-24(F), Global Connection Inc. of America dba STAND UP WIRELESS (hereinafter "Stand Up Wireless" or "Company") hereby submits this Motion for Extension of Protective Order, respectfully requesting that the Public Utilities Commission of Ohio ("Commission") continue to protect certain information filed under seal, as identified herein.

On April 8, 2013, the Company filed a Supplement to its Application for Designation as an Eligible Telecommunications Carrier ("Supplement") which included documents for which the Company sought confidential treatment, namely – 1) Contractual Service Agreement, and 2) Financial Statements (collectively, the "Protected Information"). The Protected Information was and is competitively sensitive trade secret information and public disclosure would impair Stand Up Wireless' ability to compete in the marketplace. The Commission granted the Company's Motion for Protective Order by Finding and Order entered May 15, 2013, and initially extended the Protective Order by Entry November 7, 2014. The Protective Order is now set to expire on November 15, 2016. In accordance with Ohio Adm. Code § 4901-1-24(F), Stand Up Wireless files this motion for extension of confidential treatment forty-five (45) days in advance of the expiration date of the Protective Order. The Protected Information remains confidential and continued

protection is needed.<sup>1</sup>

In support of its Motion for Extension of Protective Order, the Company provides the following information:

First, the Company seeks continued confidentiality for its Contractual Service Agreement. The Company submits (i) that the information contained in this Agreement (Exhibit C of Supplement) describes the pricing and other business details for providing wireless telecommunications service, (ii) that these financial and other business arrangements are confidential and proprietary, and (iii) that these business details are not public information in any jurisdiction. Because of these contents, this Contractual Service Agreement constitutes trade secrets under Ohio law. Furthermore, the Company is bound by confidentiality clauses within the agreement that prevent public disclosure of the information. In the competitive telecommunications market, if this information became public, current competitors would then be able to obtain highly proprietary business information which is not generally available to the public at this time. Non-disclosure of this Contractual Service Agreement is consistent with Title 49 of the Ohio Code.

Second, the Company seeks continued confidentiality for its Financial Statements (Exhibit I of Supplement). The Company is a privately held corporation and its financial statements are not part of the public record in any jurisdiction. The Company submits that its Financial Statements constitute trade secrets under Ohio law and that the disclosure of such information would be detrimental to the Company in the competitive telecommunications market as today's competitors may obtain highly proprietary business information that is not generally available to the public at this time. Non-disclosure of these Financial Statements is consistent with Title 49 of the Ohio Code.

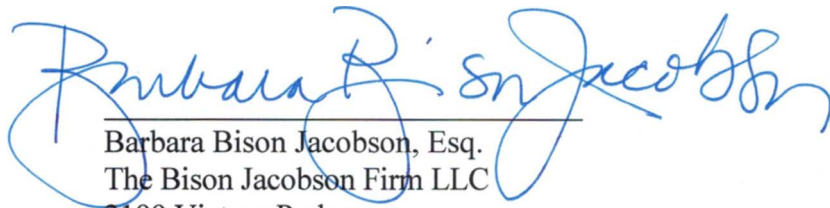
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<sup>1</sup> The Network Diagram flow chart (Exhibit D of Supplement) was previously considered part of the Protected Information; however, confidential treatment of said Exhibit is no longer required.

The Company considers the Protected Information to be a trade secret and continues to guard the secrecy of the information. The only employees who have access to the Protected Information are those with a need to know to perform their job duties. Disclosure of the Protected Information would harm Stand Up Wireless in the marketplace and provide competitors with an unfair competitive advantage.

Accordingly, the Company requests that the Commission grant the relief requested herein by granting the Motion for Extension of Protective Order, thereby continuing to maintain the Protected Information under seal and protected from public disclosure.

Respectfully submitted,



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d b S A N D W I R E L E S S

Dated: September 30, 2016

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**Case No(s). 12-2253-TP-UNC**

Summary: Motion of Global Connection Inc. of America dba STAND UP WIRELESS for Extension of Protective Order electronically filed by Heather Kirby on behalf of The Bison Jacobson Firm LLC, LPA