

BEFORE THE
STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

Acceris Management and Acquisition LLC)
for Authority to Provide Alternative)
Local Exchange Service Statewide)

MOTION FOR PROTECTIVE ORDER

Acceris Management and Acquisition LLC ("ACCERIS" or "Company"), by its attorneys and pursuant to Rules of the Florida Public Service Commission Chapter 25-22.006 and §364.183(1), F.S., hereby moves for a protective order covering certain confidential information submitted in support of ACCERIS' above-captioned Application for Authority to Provide Alternative Local Exchange Service ("Application"). ACCERIS is a wholly owned subsidiary of North Central Equity LLC ("NCE"). The Confidential Information that is the subject of this Motion comprises Exhibit B to ACCERIS' Application, which contains the audited financial statements of the company's parent NCE. In support of this Motion, ACCERIS and NCE submits the following:

- CMP | (1) NCE is not a publicly traded company. As such, NCE does not file financial statements with
COM | the SEC;
- CTR | (2) The information in Exhibit B contains sensitive financial information, which NCE protects
ECR | from disclosure. This information is not generally available to those inside the Company without specific need-
GCL | to-know, and the Company keeps it in a secure location to prevent inadvertent disclosure. This information has
DPC | not been released previously;
- AMS | (3) Public disclosure of the information would cause undue harm to NCE and would prove
RCA | detrimental to NCE' competitive position in the marketplace; and
SCR |
- SEC | (4) Due to the sensitive nature of this information, it is appropriate for the Commission to limit
DTH | access to such information. The Confidential Information is being provided for the sole use of the Commission
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in exercising governmental functions by examining the Application. There is no legitimate purpose to be served in disclosing this proprietary material to any person other than the appropriate reviewing staffs of the Commission.

WHEREFORE, ACCERIS respectfully moves that the Commission issue a Protective Order that will limit the availability of Exhibit B to the above-referenced Application to the reviewing staffs of the Commission.

Respectfully submitted,

By: _____


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Dated: July 5, 2005