

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF FLORIDA

In the Matter of the Application)
of Global Telecom Systems, Inc.)
for Original Authority to Provide)
Alternative Local Exchange)
Services Within the State of Florida)

Docket No. 010248-TV

MOTION FOR PROTECTIVE ORDER

Global Telecom Systems, Inc. ("Applicant" or Global Data Systems, Inc.), pursuant to Rule 25-22.006(5)(a) of the Florida Administrative Code hereby moves for a Protective Order from the Florida Public Service Commission. This Motion pertains to confidential financial statements (hereinafter, "Proprietary Documents") submitted with Applicant's Application for Original Authority to Provide Alternative Local Exchange Services as **Exhibit C** in the above-referenced proceeding.

In support of its motion, Applicant states as follows:

JUSTIFICATION

The material contained within the Proprietary Documents comprise highly confidential financial information that would be of significant benefit to competitors. By reviewing its financial information, competitors could determine the extent of Applicant's sister organization's operations, which could cause significant and possibly irreparable harm to Applicant and its sister company.

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The information contained within the Proprietary Documents is of no benefit to the general public. Release of the information contained within the Proprietary Documents to competitors or potential competitors could cause irreparable and continuing financial and operational harm to Applicant and its sister company. The protection sought herein is consistent with relief granted to other applicants under similar circumstances in past proceedings.

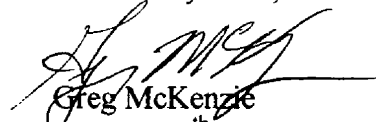
CONCLUSION

WHEREFORE, Applicant respectfully submits that there is substantial basis for restricting public disclosure of its financial statements, and therefore, requests that the Proprietary Documents be withheld from public inspection.

Respectfully submitted this 7 day of Feb, 2001.

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