BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

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In the Matter of the Application of RNK Telecom, Inc. for Original Authority to Provide Interexchange Telecommunications) Services Within the State of Florida)

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ORIGINAL

Docket No. 021021-TT

MOTION FOR PROTECTIVE ORDER

RNK Telecom, Inc. ("Applicant"), 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 Interexchange Telecommunications Services in the abovecaptioned matter. 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 operations, which could cause significant and possibly irreparable harm to Applicant. 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 the Applicant. The protection sought herein is consistent with relief granted to other applicant's under similar circumstances in past proceedings.

This confidentiality request was filed by or for a "telco" for DN 10796-02. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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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 3rd day of October, 2002.

RNK Telecom, Inc., by:

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