

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

\_\_\_\_\_) )  
In the Matter of the Application of ) )  
Bandwidth.com CLEC, LLC ) )  
 ) )  
 ) ) Case No. \_\_\_\_\_  
 ) )  
for Certificates of Service Authority to Provide ) )  
Resold and Facilities-Based Local Exchange ) )  
and Interexchange Telecommunications Services ) )  
in the State of Missouri and to Classify Those ) )  
Services and the Company as Competitive ) )  
\_\_\_\_\_)

**MOTION FOR PROTECTIVE ORDER**

Bandwidth.com CLEC, LLC (“Bandwidth.com” or “Applicant”), by and through undersigned counsel and pursuant to 4 CSR 240-2.085, hereby moves the Commission to issue a Protective Order covering the attached financial statements of Bandwidth.com Inc., (“Parent” and together with Applicant, the “Company”), contained in Exhibit C in the above-captioned Application, filed concurrently with this Motion.

Exhibit C contains highly sensitive and proprietary financial information. Allowing the Company’s competitors access to this information could put the Company at an extreme competitive disadvantage relative to other companies in the competitive telecommunications industry, especially if these competitors are not required to disclose similar information about their businesses.

In a competitive market, knowledge of a competitor’s financial status can be used to obtain an unfair business advantage. None of the information for which confidentiality is claimed can be found in any format in any other public document. While the information provided is expected to assist the Commission in reviewing the merits of the Application, the general public has no direct or

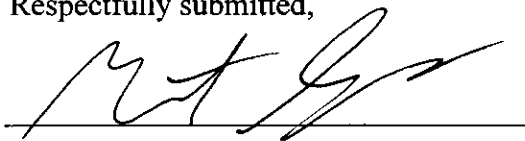
7  
1

substantive interest in the information. The financial and business information contained in Exhibit C is highly sensitive and subject to protection from disclosure as trade secrets. Moreover, the risks of harm to the Company from disclosure of such information are real, direct, and immediate; and, thus, disclosure would be contrary to the public interest.

Accordingly, Applicant submits herewith, five (5) copies of Exhibit C, which contain the confidential information, in envelopes separate from the original and the filed copies of the Application. Applicant respectfully moves that the Application be accepted for filing in the manner described herein, and that the above-referenced Exhibits C be protected from release to persons and parties outside of the Commission for a period of not less than three (3) years from the date of filing.

Respectfully submitted,

By:



Harry Malone  
Brent Salmons (Missouri State Bar #51436)  
Katie B. Besha  
2020 K St. NW  
Washington, DC 20006  
(202) 373-6000 (Tel)  
(202) 373-6001 (Fax)

COUNSEL FOR APPLICANT

Dated: October 22, 2007