

**BEFORE THE
NEW HAMPSHIRE OF PUBLIC UTILITIES COMMISSION**

In the Matter of the Supporting Documentation)
of **Lightship Telecom LLC d/b/a**)
EarthLink Business)
for the Access Revenue Filing Effective)
July 1, 2012)

Docket No. _____

MOTION FOR PROTECTIVE ORDER

Comes now, Lightship Telecom LLC d/b/a EarthLink Business ("Applicant" or "Lightship") hereby files this Motion for Protective Order prohibiting any disclosure to the general public of any portion of the documents known as Lightship Telecom LLC's Financial Information, labeled Confidential-Proprietary. Lightship requests that the Protective Order specifically state that these documents be disclosed only to Staff members directly involved in this case, and that any pleadings or other filings that incorporate, reference or attach the document or any portion thereof be submitted under Seal.

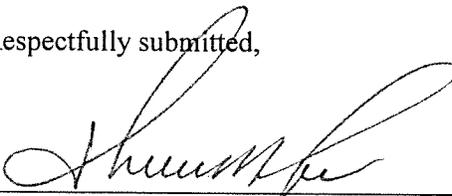
As grounds for this motion, Lightship states that it's Financial Information contain information which is required to be submitted to the Commission as part of Lightship's tariff revision, however, Lightship is a private, closely-held corporation whose financial information is maintained as highly confidential and proprietary.

Public disclosure of this information would materially damage Lightship's competitive and financial positions. Further, the public interest would be impaired by public disclosure of the information contained in Lightship's Financial Information, in that any compromise of Lightship's competitive or financial positions, vis-a-vis its competitors, would ultimately work to the detriment of the consuming public.

For the foregoing reasons, Lightship Telecom LLC d/b/a EarthLink Business requests the entry of a Protective Order containing the terms and conditions set forth above, relative to its Financial Information, and for all other appropriate relief.

Respectfully submitted,

By:



Thomas M. Forte
Consultant to Lightship Telecom LLC
2600 Maitland Center Parkway, Suite 300
Maitland, FL 32751
Telephone: 407-740-3001
Facsimile: 407-740-0613

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