## BEFORE THE NEW HAMPSHIRE OF PUBLIC UTILITIES COMMISSION

In the Matter of the Supporting Documentation	)		
of Conversent Communications of New	,		
Hampshire, LLC d/b/a			
EarthLink Business	)		
for the Access Revenue Filing Effective	)	Docket No.	
July 1, 2012	Ś		

## MOTION FOR PROTECTIVE ORDER

Comes now, Conversent Communications of New Hampshire, LLC d/b/a EarthLink Business ("Applicant" or "Conversent") hereby files this Motion for Protective Order prohibiting any disclosure to the general public of any portion of the documents known as Conversent Communications of New Hampshire, LLC's Financial Information, labeled Confidential-Proprietary. Conversent 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, Conversent states that it's Financial Information contain information which is required to be submitted to the Commission as part of Conversent's tariff revision, however, Conversent is a private, closely-held corporation whose financial information is maintained as highly confidential and proprietary.

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

For the foregoing reasons, Conversent Communications of New Hampshire, 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:

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