

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF BRANDY L. WREATH,)
DIRECTOR OF THE PUBLIC UTILITY)
DIVISION, OF THE OKLAHOMA)
CORPORATION COMMISSION, FOR A SHOW)
CAUSE HEARING AGAINST TERRACOM,)
INC. D/B/A TERRACOM WIRELESS)

CAUSE NO. PUD 201300020

FILED
FEB 14 2013

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

MOTION FOR PROTECTIVE ORDER

COMES NOW, Brandy L. Wreath, Director of the Public Utility Division ("PUD") of the Oklahoma Corporation Commission ("Commission"), by and through the undersigned counsel, to respectfully request that the Commission enter a protective order in the above styled and numbered cause, and further states:

Public utility records produced pursuant to requests for information may contain confidential customer-specific information, confidential financial information of the company, and the location of company facilities, which respondents consider confidential and proprietary in nature and the release of which could be injurious to their business and to the customers served by TerraCom Wireless. PUD requests the entry of the Commission's standard Protective Order with a proprietary agreement, or a reasonable facsimile thereof, which would be executed by all interested parties, except PUD, to assure the protection of confidential and highly-sensitive confidential information and documents produced or made available among the parties.

PUD's request for the entry of a protective order is made pursuant to the Commission's general Constitutional jurisdiction and authority found at Article IX, Oklahoma Constitution, Section 18, as well as, the specific statutory authority permitting the Commission to protect the confidential nature of public utility records, found at 51 O.S. §24A.22.

WHEREFORE, PUD respectfully requests that the Commission issue a protective order as proposed by PUD, in the above styled and numbered cause.

Dated: February 14, 2013.

Respectfully submitted,

Allison Chandler

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CERTIFICATE OF ELECTRONIC SERVICE

I, the undersigned, do hereby certify that on the 14th day of February, 2013, a true and correct copy of the above and foregoing was sent electronically and/or by U. S. Mail services, addressed to the following:

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