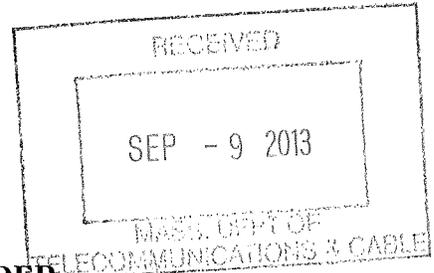


**BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

In the Matter of)
)
)
Application of Telrite Corporation d/b/a Life)
Wireless For Designation As An Eligible)
Telecommunications Carrier in the)
Commonwealth of Massachusetts for the)
Limited Purpose of Offering Wireless)
Lifeline Service to Qualified Households)
(Low Income Only))

Docket No. D.T.C. 13-1



MOTION FOR PROTECTIVE ORDER

Telrite Corporation d/b/a Life Wireless (“Telrite”) files this its Motion for Protective Order pursuant to 220 CMR 1.04(5) of the Department of Telecommunications and Cable’s (“D.T.C.’s”) Procedural Regulations, and states as follows:

1. Telrite has filed an Application for designation as an Eligible Telecommunications carrier in the Commonwealth of Massachusetts as set forth in its Application for the purpose of receiving federal universal service support for wireless services.
2. Telrite makes this request to facilitate the expeditious provision of operational information necessary to support its Application in response to information requests and to ensure that public disclosure of confidential information does not hamper its ability to operate its business and to protect strategic business information.
3. In submitting responses to the D.T.C.’s First Set of Information Requests, Telrite has thus far identified the following previously nonpublic and undisclosed information which should be subject to protection from public disclosure pursuant to the provisions of 220 CMR 1.04(5) of the Department's Procedural Regulations.
 - a. Confidential information relating to certain FCC / Commission

Investigations in response to D.T.C. 1-3;

- b. The financial statements of Telrite as a private business corporation set forth in Exhibit D;
- c. Telrite's internal three-year projections set forth in Exhibit E;
- d. Customer complaint information set forth in Exhibit F;
- e. Customer account information set forth in Exhibit G;
- f. Telrite's internal training materials contained in the disk in Exhibit J;
- g. Telrite's Massachusetts advertising and marketing plan set forth in Exhibit L;
- h. Telrite's internal audit results set forth in Exhibit M;
- i. Telrite's resale agreements with various entities set forth in Exhibit O; and
- j. Telrite statement in response to FCC's Notice of Apparent Liability dated June 2, 2008.

4. The public release of the above described information would cause Telrite and its corporate affiliates to suffer material damage to their competitive positions; would reveal proprietary facts and trade secrets; and could impair the public interest due the effect such disclosure would have on Telrite's current and future operations.

5. Telrite respectfully requests the above-described information and the documents in which it is contained be subject to a protective order and be granted provisional protection in the interim.

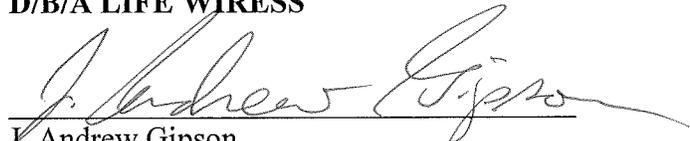
6. Should any party later ask the Commission to release from protective seal any information that the requesting party believes is not entitled to continued protection, Telritewill bear the burden of establishing that such information should continue to be protected.

WHEREFORE, Telrite respectfully requests that the Commission enter a Protective Order containing the terms and conditions set forth above and for any and all other proper relief.

Respectfully submitted,

**TELRITE CORPORATION
D/B/A LIFE WIRESS**

By:



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