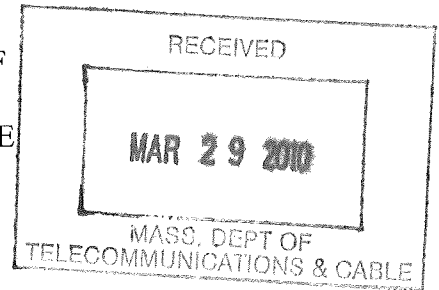


BEFORE THE
MASSACHUSETTS DEPARTMENT OF
TELECOMMUNICATIONS AND CABLE



BLC Management LLC)
) D.T.C. 09-2
d/b/a Angles Communications Solutions)

MOTION FOR PROTECTIVE ORDER OF NON-DISCLOSURE

BLC Management LLC d/b/a Angles Communications Solutions hereafter ("BLC"), by its attorney and pursuant to G.L. c. 25, §5D of the Department of Telecommunications and Cable ("the Department"), hereby moves the Department for a protective order of non-disclosure precluding public disclosure of certain proprietary, confidential information, to be filed in connection with BLC's Record Request No. 1 of the Department of Telecommunications and Cable. In support of its Motion, BLC provides the following information:

1. The information that BLC seeks to protect the information to be submitted with its Record Request No. 1 (the "Protected Information"). The Protected Information consists of: Examples of advertisements, training and employee manuals and materials, samples of bill and scripting of discussions with customers, pricing and descriptions of bundled plans for Lifeline and non-Lifeline customers, financial statements for 2008-2009 and training materials and descriptions of the verification and certification process of Lifeline eligibility for BLC. The attachments to Record Request No. 1 without the Protected Information and is marked with the words "CONFIDENTIAL AND PROPRIETARY – REDACTED". A separate sealed envelope is enclosed containing the Protected Information and is marked with the words "CONFIDENTIAL AND PROPRIETARY" and has been sent directly to Betsy S. Whittey, Hearing Officer for the Department.

2. BLC respectfully requests that the Protected Information be subject to a protective order of non-disclosure under G.L. c. 25, §5D of the Department of Telecommunications and Cable; that the Protected Information (and any reproduction or copying of any part thereof) be restricted to counsel, and other agents or employees, who have been specifically assigned to this proceeding by the Department; that the Protected Information be used solely in connection with this proceeding; that the Protected Information used in depositions, prepared testimony or other similar uses will be redacted and submitted under seal; that all Protected Information should be marked "CONFIDENTIAL AND PROPRIETARY" prior to delivery; that neither the filing of the Protected Information in this proceeding, nor the furnishing of the Protected Information for review by Department ("Staff") shall be considered a waiver of any right to object upon any ground to the use of introduction into evidence during any proceeding of any Protected Information; and that not later than thirty (30) days following the conclusion of this proceeding by issuance of a final, non-appealable order of this Department, all Protected Information designed as "CONFIDENTIAL AND PROPRIETARY" including all copies in whole or in part thereof, should be returned to BLC.

3. As grounds for this motion, BLC states:

(a) The Protected Information is not known outside of BLC.

(b) The Protected Information is not disseminated within BLC and is known only by those of BLC's employees who have a legitimate business need to know and act upon the information.

(c) BLC has maintained and seeks to preserve the confidentiality of the Protected Information through all appropriate means including the maintenance of appropriate security as its offices, and the filing of this motion.

(d) The disclosure of this Protected Information would cause material damage to the competitive and financial position of BLC in that it would provide BLC's competitors with sensitive data respecting to BLC's sales, customer usage, and financing strategies.

(e) By granting Applicant's motion, there will be no damage to any public interest in disclosure. In fact, the public will be best served by non-disclosure of the Protected Information.

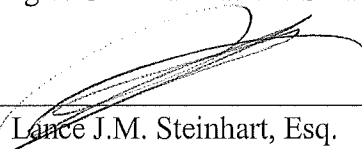
WHEREFORE, BLC Management LLC d/b/a Angles Communications Solutions requests that the Department enter an order granting BLC's motion for confidential treatment and requiring Staff to treat the Protected Information in the manner described herein.

Respectfully submitted,

BLC Management LLC

d/b/a Angles Communications Solutions

By: _____


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Dated: March 26, 2010