

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF FLORIDA

In the Matter of the Application)
of Netcon Telecom, Inc.)
for Original Authority to Provide)
Alternative Local Exchange)
Services Within the State of Florida)

Docket No. 981871-TX

MOTION FOR PROTECTIVE ORDER

Netcon Telecom, Inc. ("Applicant" or C-A Information Systems, Inc. d/b/a Netcon Corp.), pursuant to Rule 25-22.006(5)(a) of the Florida Administrative Code hereby moves for a Protective Order from the Florida Public Service Commission. This Motion pertains to confidential financial statements (hereinafter, "Proprietary Documents") submitted with Applicant's Application for Original Authority to Provide Alternative Local Exchange Services as **Exhibit C** in the above-referenced proceeding.

In support of its motion, Applicant states as follows:

JUSTIFICATION

The material contained within the Proprietary Documents comprise highly confidential financial information that would be of significant benefit to competitors. By reviewing its financial information, competitors could determine the extent of Applicant's parent organization's operations, which could cause significant and possibly irreparable harm to Applicant and its parent company.

This document has been placed in confidential storage pending advice from OPR staff on further handling.

13-

DOCUMENT NUMBER-DATE

14149 DEC 17 88

FPSC-RECORDS/REPORTING

The information contained within the Proprietary Documents is of no benefit to the general public. Release of the information contained within the Proprietary Documents to competitors or potential competitors could cause irreparable and continuing financial and operational harm to Applicant and its parent company. The protection sought herein is consistent with relief granted to other applicants under similar circumstances in past proceedings.

CONCLUSION

WHEREFORE, Applicant respectfully submits that there is substantial basis for restricting public disclosure of its financial statements, and therefore, requests that the Proprietary Documents be withheld from public inspection.

Respectfully submitted this 15 day of Dec., 1998.

Netcon Telecom, Inc.

By: 

Tony Ardolino
President
2494 Bayshore Blvd., Suite 204
Dunedin, Florida 34698

Telephone: 727.738.5553
Facsimile: 727.738.5554

Applicant's Regulatory Consultants
Ms. Tamra Burgwardt
ISG-Telecom Consultants, Int'l.
3702 Stonewall Circle
Atlanta, Georgia, 30339

Telephone: 770.805.0800
Facsimile: 770.333.0311
E-mail: burgwardt@isg-telecom.com