

BEFORE THE
ILLINOIS COMMERCE COMMISSION

ILLINOIS
COMMERCE COMMISSION

Nov 1 9 33 AM '00

CHIEF CLERK'S OFFICE

IN THE MATTER OF)
)
Global Metro Networks Illinois, LLC)
)
Application for a certificate of)
local and interexchange authority)
to operate as a facilities)
based carrier of telecommunications)
services in the State of Illinois)

00-0702

MOTION OF GLOBAL METRO NETWORKS ILLINOIS, LLC
FOR PROTECTIVE ORDER

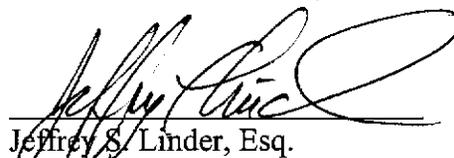
Global Metro Networks Illinois, LLC (the "Company"), hereby submits this Motion for Protective Order pursuant to 83 Ill. Adm. Code 200.500(h) and 200.430 with respect to the balance sheet, projected financial figures, and chart of accounts (the "Financial Materials") attached as Exhibits D and F to its Application for a certificate of local and interexchange authority to operate as a facilities based carrier of telecommunications services filed with the Illinois Commerce Commission (the "Commission") concurrently with this Motion. Global Metro Networks Illinois, LLC proposes that the expiration date for the proprietary status of the data be five years from the date of submission of the Financial Materials, October 31, 2000.

These Financial Materials are furnished to the Commission by Global Metro Networks Illinois, LLC for the purpose of demonstrating compliance with the Commission's financial fitness requirements. The Company submits that there exists a compelling need to protect these Financial Materials, which contain information not otherwise available to the public and to the Company's competitors. Disclosure of this sensitive financial information is unnecessary to ensure satisfaction of the Commission's financial fitness requirements. Furthermore, disclosure

of this information would adversely affect the Company's competitive position in the highly competitive telecommunications market in Illinois.

Global Metro Networks Illinois, LLC

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October 31, 2000