

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

BEFORE THE
ILLINOIS COMMERCE COMMISSION

ORIGINAL
ILLINOIS
COMMERCE COMMISSION

2011 JAN 18 P 2:14

CHIEF CLERK'S OFFICE

Docket No. 11-0051

Application of)
)
TELEFONICA USA, INC.)
)
For a Certificate of Local Exchange,)
Interexchange and Wireless)
Telecommunications Services)
in the State of Illinois)

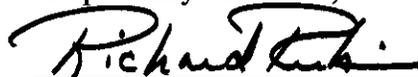
MOTION FOR PROPRIETARY TREATMENT

Telefonica USA, Inc. ("TUSA") by counsel, submits to the Illinois Commerce Commission ("Commission") this Motion for Proprietary Treatment ("Motion"). In support thereof, the Applicant states as follows:

1. Of even date herewith, TUSA filed with the Commission an Application for a Certificate to Become a Telecommunications Carrier in the State of Illinois (the "Application.")
2. Confidential Exhibit E to the Application includes certain unaudited financial statements of TUSA. TUSA is a private company. The information contained in the financial statements are of a confidential and proprietary nature. Confidential treatment is appropriate to protect the financial statements. During the course of this proceeding, TUSA may also receive data requests, interrogatories, and/or requests for production of documents or items from the Commission Staff or parties that may request the financial statements in Confidential Exhibit E. TUSA requests that the Commission handle this information as proprietary material.
3. TUSA requests confidential treatment for a period of two years from the date of this motion.

Wherefore, TUSA respectfully requests that the Commission grant this Motion for Proprietary Treatment for Confidential Exhibit E.

Respectfully submitted,

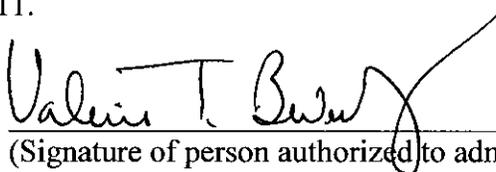


Richard Rubin
Counsel for Telefonica USA, Inc.
Winston & Strawn LLP
1700 K Street, NW
Washington, DC 20016
(202) 282-5629
RRubin@winston.com

Dated: January 13, 2011

Subscribed and sworn to before me, a Notary Public in Washington, District of Columbia, this

13th day of January, 2011.



(Signature of person authorized to administer oath)

VALERIE T. BEVERLY
Notary Public District of Columbia
My Commission Expires 5/14/2012