OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

BEFORE THE
ILLINOIS COMMERCE COMMISSION

ANPI Business, LLC fka Zone Telecom, LLC	:	
	:	
Petition for relief to protect Petitioner's Annual Report from disclosure for not less than two years in order to protect highly proprietary information.	:	**Docket No.** 14-0232
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ILLINOIS COMMERCE COMMISSION
2014 MAR 21 A 10: 13
CHIEF CLERK'S OFFICE

By:

March 12, 2014

Judith A. Riley
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BEFORE THE
ILLINOIS COMMERCE COMMISSION

ANPI Business, LLC fka Zone Telecom, LLC	:	
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Petition for relief to protect Petitioner's Annual Report from disclosure for not less than two years in order to protect highly proprietary information.	:	**Docket No. _____**

ANPI Business, LLC fka Zone Telecom, LLC ("ANPI Business" or "Petitioner"), hereby respectfully requests that the Commission issue an order permitting the Petitioner's 2013 Illinois Annual Report to be filed under seal of confidentiality and withheld from public inspection.

Petitioner is certificated by the Commission to provide competitive telecommunications services in the State of Illinois, and as such is required to file an Annual Report pursuant to Section 5-109 of the Public Utilities Act ("Act") 220 ILCS 5/1-101 et seq.

The Petitioner is a privately-held Company and, as such, is not required to disclose its financial information to the public in the ordinary course of business. Release of the Confidential Information to the public is not essential to the Commission's review of the Petitioner's Annual Report and is of no benefit to the general public.

The Confidential Information, which is comprised of sensitive financial information that the Petitioner considers highly confidential and proprietary, would be of significant benefit to the Petitioner's competitors. By reviewing the Confidential Information, competitors could determine the extent of the Petitioner's operations, including its cash position, liabilities, revenues, expenses, and other data that the Petitioner considers highly proprietary and confidential. Disclosure of such information to the Petitioner's competitors could cause significant and possibly irreparable financial and operational harm to Petitioner and would place the Petitioner at an unfair business

disadvantage in a competitive telecommunications market.

Section 7(g) of the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq., exempts from disclosure: Trade secrets and commercial or financial information obtained from a person or business where such trade secrets or information are proprietary, privileged or confidential, or where disclosure of such trade secrets or information may cause competitive harm;

For the reasons stated herein, Petitioner submits that good cause exists for the Commission to permit the Confidential Information to be filed under seal of confidentiality and withheld from public inspection.

WHEREFORE, ANPI Business, LLC fka Zone Telecom, LLC respectfully requests that its Petition to file its 2013 Illinois Annual Report under seal of confidentiality for not less than two years be granted.

Respectfully submitted,

ANPI Business, LLC fka Zone Telecom, LLC

By: Judith A. Riley

Dated: March 12, 2014

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VERIFICATION

I, Judith A. Riley, first being duly sworn upon oath, depose that I have read the above foregoing Motions by me subscribed and know the contents thereof; that said contents are true in substance and in fact, except to those matters stated upon information and belief, and to those, I believe the same to be true.

Judith A. Riley,
Tax and Regulatory Consultant
for ANPI Business, LLC

Subscribed and sworn to before me
this 19th day of March, 2014.

Notary Public

TERRY ENGLEER ALLEN
COMM. NO. 12001176
NOTARY PUBLIC
12/17/2016
STATE OF OKLAHOMA