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COMMISSION

2015 MAR -3 P 3: 25

CHIEF CLERK'S OFFICE

KEPS Technologies, Inc. d/b/a ACD.net)
)
Application for a certificate of)
Local and Interexchange Authority)
to operate as a facilities based)
carrier of telecommunications services)
in the State of Illinois.)

15-0025

ALJ Benn

**MOTION FOR CONFIDENTIAL AND PROPRIETARY TREATMENT
OF KEPS TECHNOLOGIES, INC.'S
FINANCIAL INFORMATION**

Now comes KEPS Technologies, Inc. d/b/a ACD.net ("KEPS"), by and through its attorney, Charles F. Stone, and respectfully requests that this Honorable Administrative Law Judge make a determination that Confidential Exhibit V, the Financial Statements filed in support of KEPS's application, contains confidential, proprietary information or trade secrets. In accordance with the Illinois Administrative Code, Title 83, Section 200.605, KEPS further requests an Order that the Illinois Commerce Commission remove Confidential Exhibit V from public disclosure on its website and replace it with Redacted Exhibit V (attached hereto), in which confidential or proprietary financial information has been deleted.

In support of the Motion, KEPS states as follows:

1. KEPS is a closely held, and privately owned and operated company.
2. KEPS's financial data is not public data and has not been disclosed to the general

public in its course of business.

3. As a competitive provider of communications services, KEPS places uttermost importance and premium on its financial data. The financial data is both proprietary and competitively sensitive.

4. The confidential financial data has independent economic value as trade secret in accordance with Illinois Administrative Code, Title 83, Section 200.605 and is being treated as trade secret by KEPS.

5. KEPS has taken necessary measures to ensure that its financial data is not readily available to persons outside of KEPS. KEPS keeps its financial data in a secure place where such financial data cannot be accessed without sufficient management and operational authority.

In conclusion, KEPS respectfully requests that the Administrative Law Judge make a determination that Confidential Exhibit V filed in the application contains confidential, proprietary information or trade secret, and enter an Order that Confidential Exhibit V be removed from the Commission's website and be replaced with Redacted Exhibit V.

Respectfully submitted,

KEPS Technologies, Inc., d/b/a ACD.net



Charles F. Stone
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Local Counsel for
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Dated: March 2, 2015

Verification

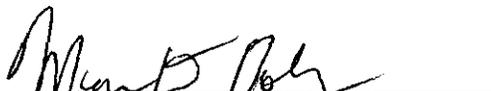
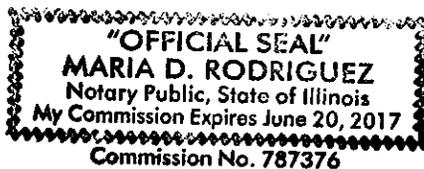
I, Charles Stone, being duly sworn under oath, depose and say that I am a licensed attorney in the state of Illinois, and that I have read the attached and foregoing Motion and know the contents thereof; that said contents are true in substance and in fact, except to those matters stated upon information and belief, and as to those, I believe same as true.



Charles F. Stone

Subscribed and sworn to before me

This 2nd day of March, 2015


Notary Public, Illinois

Certificate of Service

The undersigned attorney hereby certifies that copies of the Applicant's Motion for Confidential and Proprietary Treatment of KEPS Technologies, Inc.'s Financial Information, Verification, and Redacted Exhibit V have been served by email to all persons on the following Service List on March 2, 2015.


Charles F. Stone

Service List

Bonita Benn, Administrative Law Judge
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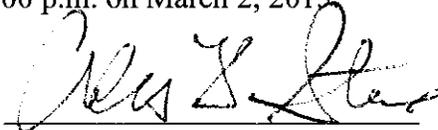
NOTICE OF FILING

To: Administrative Law Judge Bonita Benn;

ICC Case Manager George Light;

Gary L. Field and Hai Jiang, Attorneys for the Applicant;

PLEASE TAKE NOTICE that the undersigned attorney, CHARLES F. STONE, filed the enclosed *Motion for Confidential and Proprietary Treatment of KEPS Technologies, Inc.'s Financial Information* with a *Redacted Exhibit V* by placing an original copy of each in an envelope addressed to "Chief Clerk, Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, IL 62701," with proper postage affixed, and by depositing the envelope in the U.S. Mail at Adams and Dearborn Streets, Chicago, Illinois, at about 2:00 p.m. on March 2, 2015.



Charles F. Stone

Certificate of Service

The undersigned attorney certifies that on March 2, 2015 he served true copies of this *Notice of Filing* and the above-referenced *Motion for Confidential and Proprietary Treatment of KEPS Technologies, Inc.'s Financial Information with Redacted Exhibit V* upon the persons on the attached Service List electronically to the email addresses on that Service List.



Charles F. Stone

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Case Number: 15-0025

Mailing Labels

4 results

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Miscellaneous and Party of Record
Added to Service List on 01/14/2015

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Petitioner and Party of Record
Added to Service List on 01/14/2015

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Miscellaneous and Party of Record
Added to Service List on 01/20/2015