

BEFORE THE SOUTH DAKOTA PUBLIC SERVICE COMMISSION

**APPLICATION FOR A CERTIFICATE OF AUTHORITY TO PROVIDE
ALTERNATIVE OPERATOR SERVICES**

In the Matter of the Application of)
Consolidated Telecom, Inc. d/b/a Secured)
Technologies, Inc. for a Certificate of Authority) Docket No. _____
Provide Alternative Operator Services)
Within the State of South Dakota)

**MOTION FOR LEAVE TO FILE
FINANCIAL INFORMATION UNDER SEAL OF CONFIDENTIALITY**

Consolidated Telecom, Inc. d/b/a Secured Technologies, Inc. ("Consolidated"), hereby respectfully requests that the confidential financial information provided in accord with its application for a Certificate of Authority to operate as a provider of alternative operator services within the State of South Dakota be filed under seal of confidentiality and withheld from public inspection.

Consolidated is a privately-held company. The information produced as part of Consolidated's concurrently filed application for a Certificate of Authority that has been identified by Consolidated as "confidential" should not be open to public inspection, because it contains detailed information of a confidential nature regarding Consolidated's financial condition. Release of this information to the public is not essential to the Commission's review of Consolidated's concurrently-filed application for a Certificate of Authority to operate as an alternative operator services, and public disclosure of its contents would place the applicant at an unfair business disadvantage.

Public disclosure of the information contained herein that Consolidated has identified as confidential would reveal information to the public and Consolidated's actual and potential competitors regarding Consolidated's cash position, liabilities, revenues, expenses, and other data

which Consolidated considers highly proprietary and confidential. Public disclosure of such information would materially damage Consolidated's competitive and financial positions, and would place Consolidated in an unfair competitive disadvantage because Consolidated does not have access to similar information of its competitors. Additionally, it is Consolidated's general practice to disclose the information provided in its financial statements only to parties who have entered into a confidentiality agreement with Consolidated.

For the reasons stated herein, Consolidated submits that good cause exists for the Commission to permit the financial information contained herein and submitted with its application for a Certificate of Authority to operate as an alternative operator services provider within the State of South Dakota that has been identified by Consolidated as "confidential" to be filed under seal of confidentiality and withheld from public inspection.

WHEREFORE, Consolidated respectfully requests that its Motion for Leave to file financial information under seal of confidentiality be granted.

Respectfully submitted,

Date: 11-15-2013

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