

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF TOTAL CALL MOBILE,)
INC. FOR LIMITED DESIGNATION AS) CASE NO.
AN ELIGIBLE TELECOMMUNICATIONS) 2014-00268
CARRIER)

**TOTAL CALL MOBILE, INC.'S PETITION TO FILE UNDER SEAL RESPONSES TO
THE KENTUCKY PUBLIC SERVICE COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION**

Pursuant to 807 KAR 5:001 Section 13(a) and KRS 61.878, Total Call Mobile, Inc. ("Total Call"), respectfully requests confidential treatment of its Responses to The Kentucky Public Service Commission Staff's First Request for Information.

Total Call is requesting confidential treatment of its business planning and marketing strategies, because the strategies were created, and are kept, for internal Company use generally recognized as confidential or proprietary. This request is made for an indefinite period of time, since disclosure of such information would provide existing and potential competitors with an unfair and undeserved competitive advantage by allowing them to have access to information that Total Call does not make available to the public. Total Call's competitors would be able to use and counter Total Call's business planning and marketing strategies to determine whether and how they would compete to provide service to Lifeline-eligible customers.

Respectfully submitted,


~~Mark S. Yurick / Michael A. Byers Esq. per
authority 10/24/14~~
Mark S. Yurick (94693)
Taft Stettinius & Hollister, LLP
65 E. State Street, Suite 1000
Columbus, OH 43215-3413
Direct Dial: 614-334-7197
Email: myurick@taftlaw.com
614-221-2838 – Telephone
614-221-20007 – Facsimile

Robert Yap
Chief Legal Officer
Total Call Mobile, Inc.
1411 W. 190th Street, Suite 700
Gardena, CA 90248
Email: roberty@totalcallusa.com
310-818-4300 – Telephone
800-710-0963 – Facsimile