

# GO MD USA LLC

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July 17, 2024

## VIA ELECTRONIC DELIVERY

Filed Electronically  
Linda C. Bridwell  
Executive Director Public Service Commission  
211 Sower Blvd. P. O. Box 615  
Frankfort, KY 40601

**Re: Go MD USA, LLC's Application of Go MD USA LLC For a Limited Designation as an Eligible Telecommunications Carrer for the Purpose of Offering and Operating a Lifeline Service for Low Income Consumers**

Dear Ms. Bridwell:

Attached please find for filing Go MD USA LLC's Application of Go MD USA LLC For a Limited Designation as an Eligible Telecommunications Carrer for the Purpose of Offering and Operating a Lifeline Service for Low Income Consumers.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me at 901-230-4697 or VP [Jack](#) Sosa at (833) 706-3872.

Thank you.

Sincerely,

Mark J. Schirmer  
General Counsel  
Go MD USA

Attachment

cc: APOLLO ARCALLANA, PRESIDENT  
Michael Campbell, Corporate Counsel  
Go MD USA LLC

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

<p>IN THE MATTER OF GO MD USA LLC'S Petition for Designation as Designation as an Eligible Telecommunications Carrier in the State of Kentucky a for the Limited Purpose of Providing Lifeline Service to Qualifying Customers</p> <p>Motion for a Protective Order</p>	<p>DOCKET NO. _____</p>
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**MOTION FOR A PROTECTIVE ORDER**

GO MD USA, LLC ("GO MD USA"), by its undersigned counsel and pursuant to the Commission's Rules, moves for a protective order to prevent public disclosure of the confidential and proprietary financial information included as Confidential \_\_\_\_\_ and 2\_ carrier contracts \_\_\_\_\_ in its Application to the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in the above-captioned proceeding for authority to provide telecommunications services throughout Kentucky. In support of this Motion, GO MD USA states as follows:

1. GO MD USA has submitted an Application to the Commission for authority to provide telecommunications services throughout Kentucky. As part of that Application, GO MD USA provides \_\_\_\_\_ as Confidential \_\_\_\_\_ and the \_\_\_\_\_ as Confidential Exhibit \_\_\_\_\_.
2. GO MD USA and its affiliates are privately held companies and are not required to file financial information with the United States Securities and Exchange Commission and do not otherwise disclose their financial information to the public.

3. GO MD USA and its affiliates use their best efforts to keep and maintain the confidentiality of the information contained in Confidential Exhibits \_\_\_ and \_\_\_\_\_. To the best of GO MD USA's knowledge, the information contained in these Exhibits has not been disclosed or released to the public.

4. The information contained in these Exhibits derives economic value from not being generally known to, and not being readily ascertainable through proper means by, other persons who can obtain economic value from its disclosure and use. Specifically, the information contained therein is extremely sensitive financial information that could be used by competitors to determine revenue and other information damaging to the Company. Disclosure of such information would be extremely detrimental and could be used by GO MD USA's competitors to materially affect the company's ability to compete effectively.

5. Due to the sensitive nature of the information contained in Confidential Exhibits \_\_\_\_\_, it is appropriate for the Commission to limit access to it. Confidential Exhibits \_\_\_\_\_ should solely be used by the Commission in exercising its governmental functions in considering GO MD USA's Application. There is no legitimate purpose or public interest to be served in disclosing the information contained in Confidential Exhibits \_\_\_\_\_ to GO MD USA's current or future competitors or to any person other than the appropriate staff of the Commission.

WHEREFORE, GO MD USA respectfully requests that the Commission grant a Protective Order allowing Confidential Exhibits \_\_\_\_\_ of the Application to be treated as confidential.

July \_\_\_, 2024

Respectfully submitted,

/s/ Mark J. Schirmer  
General Counsel, GO MD LLC

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