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September 21, 2012

Via eFiling and First Class Mail

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 North Street, Keystone Bldg., 2nd Fl.
Room N201
Harrisburg, PA 17105-3265

**Re: I/M/O a Petition by TAG Mobile, LLC for Designation as an Eligible
Telecommunications Carrier in the Commonwealth of Pennsylvania for the Limited
Purpose of Offering Lifeline and Link-Up Services to Qualified Households
Docket No. P-2011-2241542**

Dear Secretary Chiavetta:

On behalf of TAG Mobile, LLC, enclosed please find an original, public redacted copy of its Motion for Protective Order in this matter, and an unredacted copy of said Motion in the enclosed sealed envelope. An electronic copy of the public redacted Motion has been filed through the Commission's eFiling portal.

If you have any questions or require additional information, please feel free to contact me at your convenience.

Sincerely,



Bradford M. Stern

Enclosures

cc: Certificate of Service
David Screven (via e-mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of a Petition by TAG Mobile, LLC)
For Designation as an) **Docket No. P-2011-2241542**
Eligible Telecommunications Carrier in the)
Commonwealth of Pennsylvania for the)
Limited Purpose of Offering Lifeline and)
Link-Up Services to Qualified Households)

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September 2012, public copies of the attached Motion for Protective Order have been served upon the persons or organizations listed below via First Class U.S. Mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Barrett C. Sheridan
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1921

Johnnie E. Simms, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

William R. Lloyd, Jr.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101



Bradford M. Stern

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of a Petition by TAG Mobile, LLC)
For Designation as an) **Docket No. P-2011-2241542**
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Link-Up Services to Qualified Households)

MOTION FOR PROTECTIVE ORDER

Now Comes, TAG Mobile, LLC (“TAG Mobile” or the “Company”) by this Motion seeking a protective order from the Pennsylvania Public Utility Commission for withholding from public disclosure certain information filed with the Commission in this proceeding that the Company asserts is a “confidential proprietary record” under the Pennsylvania Right-to-Know Law (Act 3 of 2008, 65 Pa. C.S. §§ 67.101 *et seq.*) This Motion is submitted pursuant to 52 Pa. Code § 5.423(b).

Specifically, the Company has filed with this Motion, as Exhibit A,

- TAG Mobile, LLC (formerly dPi Mobile, LLC) – Financial Statements, Period from March 8, 2010 (Inception) through December 31, 2010 and Year Ended December 31, 2011 with Report of Independent Auditors
- Dun & Bradstreet Credibility Corporation – TAG Mobile, LLC Business Information Report

The Company is privately held and does not disclose to the public its financial information. The Company operates in a highly competitive business environment and public disclosure of the financial information contained in Exhibit A would cause substantial harm to the maintenance of its competitive position. The Affidavit of Frank Del Col, CEO and President Officer of the Company, is annexed hereto attesting to the foregoing facts.

The Right-to-Know Law defines “confidential proprietary information,” at Section 101, as

“[C]ommercial or financial information received by an agency:
(1) which is privileged or confidential; and
(2) the disclosure of which would cause substantial harm to the competitive position of the person that submitted the information.”

The Right-to-Know Law exempts, at Section 708(b)(12), a “trade secret” or “confidential proprietary information” from an agency’s obligation to provide to a “requester” access to a “record” on file with the agency.¹ The Company requests that the Commission extend said exemption to the Company’s financial information contained in Exhibit A. Accordingly, the Company requests that the Commission issue a Protective Order stating specifically that the information in Exhibit A of this Motion be disclosed only the Staff members directly involved in this proceeding, and that any pleading or other filings that incorporate, reference or attach this financial information or any portion thereof be submitted under seal.

Public copy of this Motion with Exhibit A redacted has been filed with the Secretary. A copy of this Motion without redaction also has been filed with the Secretary under seal, with the information contained in Exhibit A marked as “CONFIDENTIAL.”

Notices and all other correspondence concerning this Motion are to be addressed to:

Bradford M. Stern (Pa Atty No. 57298)
Law Offices of Bradford M. Stern LLC
22 Lakeview Holw
Cherry Hill, NJ 08003
Tel: 856-520-6806
Fax: 856-375-2151
Email: brad@bmsternlaw.com

and

J. Andrew Gipson, MSB #100792
Margarett A. Johnson, MSB #102552
Jones, Walker, Waechter, Poitevent, Carrère
& Denègre L.L.P
190 E. Capitol Street, Suite 800
Jackson, Mississippi 39205-0427
Telephone: (601) 949-4681
Facsimile: (601) 949-4804
Email: agipson@joneswalker.com
mjohnson@joneswalker.com

¹ In addition to “confidential proprietary information,” a “trade secret,” a “requester” and a “record” are all defined in Section 101 of the Right-to-Know Law.

WHEREFORE, TAG Mobile, LLC requests that the Commission issue a Protective Order:

- (1) Protecting from public disclosure the Company's financial information contained in Exhibit A attached to this Motion filed by the Company in this proceeding; and
- (2) Granting such further relief consistent therewith that the Commission deems reasonable and just.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Bradford M. Stern". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bradford M. Stern

September 21, 2012

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AFFIDAVIT

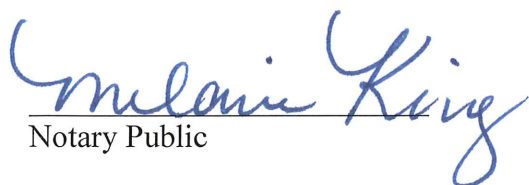
I, Frank Del Col, first being duly sworn, hereby state that I am the President and CEO of TAG Mobile, LLC (the "Company") and I am authorized to make this affidavit on behalf of the Company.

I hereby state that the facts regarding the Company that are set forth in the attached Motion for Protective Order submitted by the Company in this matter are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Frank Del Col

Subscribed and sworn before me this 21st day of September 2012.


Notary Public

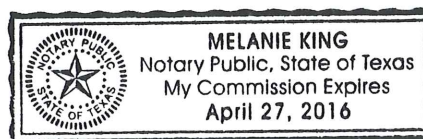


EXHIBIT A

[REDACTED]