

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of the Vermont Department of Public)
Service for an investigation into the service) Case No. 18-3231-PET
quality provided by Telephone Operating)
Company of Vermont, Inc., d/b/a Consolidated)
Communications, Inc.)

MOTION FOR APPROVAL OF PROTECTIVE AGREEMENT

Telephone Operating Company of Vermont, LLC d/b/a Consolidated
Communications (“Consolidated”) hereby moves the Vermont Public Utility Commission
 (“Commission”) to approve the Protective Agreement and proposed Protective Order
submitted herewith.

MEMORANDUM IN SUPPORT OF MOTION

Consolidated states that certain information it has or may be requested to produce is
protected, confidential information, and that public disclosure of such information could cause
cognizable harm to Consolidated and its related entities. Consolidated requests that the
Commission approve the attached Protective Agreement in order to facilitate the provision of
such information in this proceeding, while preserving its confidentiality.

DATED at Burlington, Vermont on 30th of January, 2019.

**Telephone Operating Company of Vermont,
LLC d/b/a Consolidated Communications**

By: 
Debra L. Bouffard, Esq.
SHEEHEY FURLONG & BEHM P.C.
30 Main Street, 6th Floor
PO Box 66
Burlington, VT 05402
(802) 864-9891
dbouffard@sheeheyvt.com
omeclain@sheeheyvt.com