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September 19, 2024

VIA EMAIL TO NDPSC@ND.GOV

Executive Secretary
Public Service Commission
State Capitol
600 E. Boulevard Ave., Suite 408
Bismarck, ND 58505-0480
(701) 328-2400

Re: Global Connection Inc. of America d/b/a StandUp Wireless - Case No. PU-24-288
Application for Protection of Information

Dear Sir/Madam:

Attached please find Global Connection Inc. of America d/b/a StandUp Wireless' (the "Company") Application for Protection of Information relating to the Company's Late Filed Exhibit, No. 4. A redacted, public version of the Company's Late Filed Exhibit is attached hereto.

Late Filed Exhibit, No. 4 contains confidential and proprietary information and is being sent to the North Dakota Public Service Commission's office under a separate sealed envelope via FedEx overnight delivery.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,



Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
*Attorneys for Global Connection Inc. of America d/b/a
StandUp Wireless*

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

In the Matter of the Application of Global Connection)
Inc. of America d/b/a StandUp Wireless for)
Designation as an Eligible Telecommunications Carrier) Case No. PU-24-288

APPLICATION FOR PROTECTION OF INFORMATION

Pursuant to Pursuant to N.D. Admin. Code §§ 69-02-09-01 and 69-02-09-04, Global Connection Inc. of America d/b/a StandUp Wireless (“STANDUP” or the “Company”) hereby respectfully requests that the Public Service Commission of North Dakota (the “Commission”) issue a protective order in the above-referenced case. The purpose of the requested protective order is to protect against public disclosure of trade secret or proprietary information, as defined by N.D. Cent. Code §§ 47-25.1-01(4) and 44-04-18.4.

Specifically, STANDUP requests that confidentiality be afforded to the commercially-sensitive customer information provided in the Company’s Late Filed Exhibit, No. 4 (the “Protected Information”) which is provided to North Dakota staff to aid in the analysis of the Company’s application for designation as an Eligible Telecommunications Carrier (“ETC”). As grounds for this request, the Company states that the Protected Information is confidential and proprietary, and contains commercial information that derives actual and potential independent economic value from not being known to, and not being ascertainable by proper means by, persons who can obtain economic value from its disclosure and use, such as competitors in the wireless and Lifeline industries. The Protected Information is only made available to a limited number of STANDUP personnel, is not otherwise publicly available, and the Company employs its best efforts to maintain

the secrecy of the Protected Information. Disclosure of the Protected Information would place STANDUP at a competitive disadvantage, and no public interest would be served by the disclosure of the Protected Information.

In accordance with N.D. Admin. Code § 69-02-09-02, one copy of the Protected Information is provided in the enclosed sealed envelope labeled PROTECTED INFORMATION – PRIVATE. In addition, the Company requests that the protective order be broad enough to cover all additional information exchanged in the course of this proceeding and qualifying for protection as trade secret, proprietary, commercial, and/or financial information.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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*Attorneys for Global Connection Inc. of America
d/b/a StandUp Wireless*

Dated: September 19, 2024

Global Connection Inc. of America d/d/a StandUp Wireless

Case No. PU-24-288

Late Filed Exhibit

- 1) Current ETC Designation: Alabama, Arkansas, Arizona, California, Colorado, Florida, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin, West Virginia and Wyoming.
- 2) Pending ETC Designation: Alaska, Illinois, Maine, Montana, New Jersey, North Dakota, Oregon, Vermont and United States Virgin Islands.
- 3) Prepaid Wireless Group, LLC is committed to providing funding to StandUp Wireless if needed to provide Lifeline service.
- 4) **CONFIDENTIAL**

Number of customers that purchased top-ups last month, and the revenue it generated:

