

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Proposed Rule To)
Require all Missouri Telecommunications)
Companies to Implement an Enhanced)
Record Exchange Process to Identify the)
Origin of IntraLATA Calls Terminated by)
Local Exchange Carriers.)
)

Case No. TX-2003-0301

MOTION FOR PROTECTIVE ORDER

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and moves the Missouri Public Service Commission to issue its standard-form protective order. In support thereof, the Staff respectfully states to the Commission as follows:

1. On July 14, 2005, SBC Missouri filed an Application for Rehearing, and Alternative Request for Temporary Variance or Waiver in this case. The Commission issued its Order Denying Application for Rehearing and Granting a Temporary Waiver on July 28, 2005. In the Order Denying Rehearing, the Commission also directed the Staff to file, by no later than August 4, 2005, “a recommendation and memorandum regarding the requirement of 4 CSR 240-29.040(4) that the originating Calling Party Number (CPN) be included in the 11-01-XX billing records for wireless-originated calls.” On August 4, 2005, the Staff filed a motion asking the Commission to extend the time for the filing of the Staff recommendation to August 10, 2005. The Staff’s motion is still pending.

2. The issue that the Commission has directed the Staff to address in its recommendation and memorandum was raised in Section 1 of SBC Missouri’s Application for Rehearing. SBC Missouri referred therein to a Telcordia Technologies document entitled “Generic Requirements for Wireless Service Provider (WSP) Automatic Message Accounting (AMA),” and known as GR-1504-CORE. Leo Bub, counsel for SBC Missouri, has informed the Staff that Telcordia

regards this document as proprietary and that it has directed SBC Missouri to provide notice that this material is protected by copyright and that further copies of the document cannot be made without the consent of Telcordia. Public disclosure of this material may therefore tend to harm the interests of Telcordia and of SBC Missouri.

3. The Staff has prepared a preliminary draft of the recommendation and memorandum that the Commission has directed it to file. The Staff intends to attach to its recommendation copies of selected pages from the Telcordia document, after a protective order has been issued, and to identify them as “proprietary,” in order to prevent public disclosure of this proprietary information.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place, the Staff moves the Commission to issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary” material.

WHEREFORE, the Staff respectfully requests that the Commission issue its standard-form protective order containing classifications of “highly confidential” and “proprietary” material to guide the parties’ conduct in this case.

Respectfully submitted,

DANA K. JOYCE

General Counsel

/s/ Keith R. Krueger

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or e-mailed to all counsel of record on this 9th day of August 2005.

/s/ Keith R. Krueger