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April 29, 2005

FILED²

APR 29 2005

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Matrix Telecom, Inc.; Basic Local Application

Dear Judge Roberts:

Enclosed for filing in the above-referenced matter, please find the original and eight copies of an Application for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in portions of the State of Missouri and for Competitive Classification. I note that I filed a motion for a protective order with the Commission in conjunction with Exhibit C of the Application and also enclose the original and eight copies of the highly confidential Exhibit C which is filed under seal. In addition, I point out that the Application contains a tariff labeled Exhibit D bearing a 45-day effective date, and I enclose the original and five copies of such tariff.

If you have any questions, please advise. Thank you very much for your attention to this matter.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:



Cathleen A. Martin
martinc@ncrpc.com

CAM:clv

Enclosures

cc: Office of Public Counsel
General Counsel
Judith Riley, Esq.
Greg Taylor
Bill Haas

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION

FILED²
APR 29 2005

Missouri Public
Service Commission

_____))
In the Matter of the Application of)
Matrix Telecom, Inc.'s for a)
Certificate of Service Authority to Provide)
Basic Local Telecommunications Service)
in the State of Missouri and to Classify)
Said Services and the Company as Competitive)
_____)

Case No. _____

MOTION FOR PROTECTIVE ORDER

COMES NOW Matrix Telecom, Inc. ("Matrix"), by its undersigned counsel and pursuant to 4 CSR 240-2.085, hereby moves for a protective order covering certain confidential information submitted in support of Matrix's Application in the captioned matter ("Application"). The Confidential Information that is the subject of this Motion is Exhibit C to Matrix's Application, which contain Matrix's financial statements. In support of this Motion, Matrix submits the following:

1. Matrix is a non-publicly traded company. Therefore, Matrix does not file its financial statements with the SEC on Form 10-K or 10-Q.
2. The financial statements of Matrix submitted in Exhibit C to the Application are not available to the public. Furthermore, Matrix considers its income statements and balance sheets confidential, proprietary and non-public commercial information.
3. Disclosure of the income statements and balance sheets would be extremely detrimental and could be used by Matrix's competitors to gain a competitive advantage in the marketplace. Moreover, competitors at any level possessing such information would find it of great economic value in devising their own business plans and, in many cases, could use such

information to structure their plans in such a way as to undercut or materially affect Matrix's competitive positions.

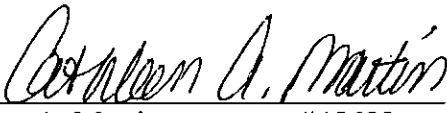
4. Due to the sensitive nature of this information, it is appropriate for the Commission to limit access to such information. The confidential information is being provided for the sole use of the Commission in exercising its governmental functions by examining the Application. There is no legitimate purpose to be served in disclosing this proprietary material to any person other than the appropriate reviewing staff of the Commission.

5. The financial statements set forth in Exhibit C to the Application are not readily ascertainable by persons external to Matrix, and none of the information for which this claim of confidentiality is made may be found in any format in any other public document.

6. Matrix requests that the material contained in Exhibit C to Matrix's Application be held confidential for a minimum of three (3) years.

WHEREFORE, Matrix Telecom, Inc. respectfully moves that the Commission issue a Protective Order that will limit the availability of Exhibit C to the above-referenced Application to the reviewing staff of the Commission.

NEWMAN, COMLEY & RUTH P.C.

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ATTORNEYS FOR APPLICANT MATRIX TELECOM, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was e-mailed on this 29th day of April, 2005, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

