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December 15, 2003

Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

**Re: Case No. IO-2004-0231**

**FILED**

**DEC 15 2003**

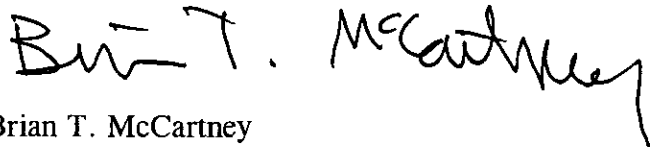
**Missouri Public  
Service Commission**

Dear Mr. Roberts:

Enclosed for filing on behalf of Cass County Telephone Company, Citizens Telephone Company of Higginsville, Missouri Inc., Green Hills Telephone Corporation, and Lathrop Telephone Company ("Petitioners"), please find an original and eight (8) copies of a Motion for Protective Order.

Please see that this filing is brought to the attention of the appropriate Commission personnel. I thank you in advance for your cooperation in this matter.

Sincerely,



Brian T. McCartney

BTM/lar

Enclosure

cc: General Counsel  
Michael Dandino  
Lisa Creighton Hendricks

FILED

DEC 15 2003

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Petition for Suspension of the Federal )  
Communications Commission Requirement ) Case No. IO-2004-0231  
to Implement Number Portability )

Missouri Public  
Service Commission

**Motion for Protective Order**

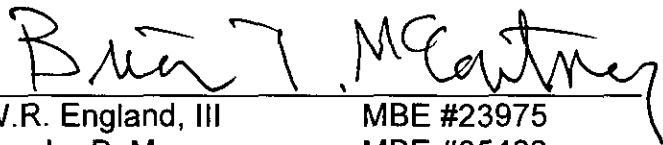
COME NOW Petitioners, by counsel, in accordance with 4 CSR 240-2.085, and, for their motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, state as follows:

1. On December 11, 2003, the Commission issued its order directing Petitioners to "file documentation supporting their Petition for Suspension."
2. Petitioners' responses to this order may include competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in filings or testimony by other parties may contain customer-specific information, competitive pricing information, trade secrets, and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. None of the information can be found in any other public document, and public disclosure of the referenced material which the Commission's Staff, the Office of Public Counsel, and/or Intervenors may seek in discovery may tend to harm the interests of the Company, its employees, and its customers.
3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, Petitioners respectfully request that the Commission issue in this case its standard-form protective order

containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Petitioners, pursuant to 4 CSR 240-2.085, request that the Commission: (a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



W.R. England, III MBE #23975  
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Attorneys for Petitioners

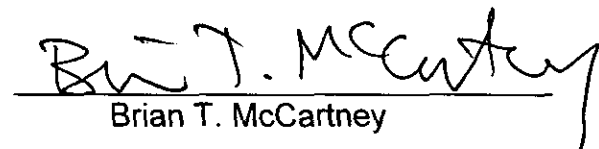
#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 15<sup>th</sup> day of December, 2003, to the following parties:

General Counsel  
Missouri Public Service Commission  
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Jefferson City, Missouri 65102

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