

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

In the matter of the Joint Application)
of New Florence Telephone Company,)
Tiger Telephone, Inc. and Direct)
Communications Rockland, Inc.)
for an order authorizing Direct)
Communications Rockland, Inc.)
to purchase or acquire, take or hold all of)
the issued and outstanding capital stock)
of Tiger Telephone, Inc.)

Case No. _____

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Come now New Florence Telephone Company ("New Florence"), Tiger Telephone, Inc. ("TigerTel") and Direct Communications Rockland, Inc. ("DCR") (sometimes collectively referred to as "Joint Applicants"), pursuant to 4 CSR 240-2.085(2), and move the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Joint Applicants respectfully state to the Commission as follows:

1. On this same date, Joint Applicants are filing a Joint Application with the Commission wherein DCR requests authority to acquire all of the capital stock of TigerTel, the holding company for New Florence.

2. As an exhibit to the Joint Application, Joint Applicants will be filing the Stock Purchase Agreement between the individual shareholders of TigerTel, TigerTel, New Florence and DCR with all its attachments. Because the Stock Purchase Agreement and its attachments contain confidential and proprietary information regarding the acquisition, Joint Applicants request that the Commission issue a Protective Order so that these documents may be filed as

"proprietary." Joint Applicants anticipate that there will be additional confidential or proprietary information requested by the Commission Staff as it conducts its review of this transaction.

3. None of the information for which a claim of confidentiality is made can be found in any format in any other public document.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place, Joint Applicants move the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Joint Applicants respectfully 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,



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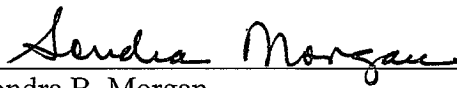
Attorneys for New Florence Telephone Company,
Tiger Telephone, Inc. and Direct Communications
Rockland, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic submission or hand-delivered this 2nd day of October, 2006 to:

Mr. Mike Dandino
Office of the Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102

Mr. Kevin Thompson, General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102



Sondra B. Morgan