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March 3, 2004

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Secretary/Chief Administrative Law Judge Missouri Public Service Commission P. O. Box 360

P. O. Box 360 Jefferson City, MO 65102

Missouri Public Service Commission

MAR 0 3 2004

Re: In the Matter of the Petition of Alma Telephone Company for Suspension and Modification of Local Number Portability Obligations and Motion for Expedited Treatment

Dear Secretary:

EUGENE E. ANDERECK

TERRY M. EVANS

ERWIN L. MILNE

CRAIG S. JOHNSON

RODRIC A. WIDGER

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT COREY K. HERRON

GEORGE M. JOHNSON

MATTHEW M. KROHN

JACK PEACE

Enclosed for filing please find an original and eight (8) copies of Alma Telephone Company's Petition for Suspension and Modification of Local Number Portability Obligations and Motion for Expedited Treatment and Motion for Protective Order.

Thank you for seeing this filed.

Sincerely,

Lisa Cole Chase

LCC:lw

enclosure

CC:

General Counsel, MO Public Service Commission

General Counsel, Office of Public Counsel

FILED
MAR 0 3 2004

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Alma)		SHALES STANDIGE
Telephone Company for Suspension of the)	Case No	
Federal Communications Commission)		
Requirement to Implement Number Portability	′)		

MOTION FOR PROTECTIVE ORDER

COMES NOW ALMA Telephone Company ("Alma" or "Petitioner"), by counsel, in accordance with 4 CSR 240-2.085, and, for its motion for issuance of the Missouri Public Service Commission's ("Commission") standard form protective order, states as follows:

- 1. Concurrently with this motion, Petitioner has filed a Petition for Suspension and Modification of the Federal Communications Commission ("FCC") requirements for wireline-to-wireless Local Number Portability ("LNP").
- 2. Petitioner plans to file company-specific information to support this Petition that may include competitive pricing information, employee-specific 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 ("Staff"), the Office of Public Counsel ("OPC"), and/or Intervenors may seek in discovery may tend to harm the interests of the Petitioner, 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, Alma respectfully requests that the

Commission issue in this case its standard-form protective containing classifications of "highly confidential" and "proprietary."

Wherefore, Alma, pursuant to 4 CSR 240-2.085, requests that the Commission issue the Commission's standard form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case, and grant such further relief as the Commission deems appropriate.

Respectfully submitted,

ANDERECK, EVANS, MILNE PEAÇE & JOHNSON

By:

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700 East Capitol P.O. Box 1438

Jefferson City, MO 65102 Telephone: 573/634-3422 Facsimile: 573/634-7822 email: CJohnson@aempb.com

email: lisachase@aempb.com

ATTORNEYS FOR PETITIONER

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 3rd day of March, 2004, to the following parties:

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102 General Counsel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Lisa Cole Chase