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April 4, 2002

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

Re: Case No.TC-2002-194

Gentlemen:

Enclosed please find an original and eight (8) copies of Petitioners' Motion for Protective Order.

Thank you for seeing this filed.

Sincerely,



Lisa Cole Chase

LCC:tr
Enc.

cc: MITG Managers
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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

**Alma Telephone Company, Chariton)
Valley Telecommunications Corp.,)
Choctaw Telephone Company, Mid-)
Missouri Telephone Company, Modern)
Telecommunications Company, MoKan)
Dial, Inc., and Northeast Missouri Rural)
Telephone Company,)**

Petitioners,)

vs.)

Case No. TC-2002-194

**Southwestern Bell Telephone Company,)
Sprint Missouri Inc.,)
AT&T,)
Birch Telecom of Missouri, Inc. ,)
e.spire Communications, Inc.,)
Global Crossing Local Services, Inc.,)
Ionex Communications, Inc.,)
Logix Communications Corp.,)
MCI WORLDCOM Communications)
Inc.)
McCleodUSA Telecommunication)
Services Inc.,)
Mpower Communications Central Corp.)
Navigator Telecommunications, LLC)
NuVox Communications of Missouri, Inc.)
Ominplex Communications Group, LLC,)
Teligent, Inc.)**

Respondents.)

MOTION FOR PROTECTIVE ORDER

COMES NOW Petitioners, Alma Telephone Company, Chariton Valley

Telecommunications Corp., Choctaw Telephone Company, Mid-Missouri Telephone Company,

Modern Telecommunications Company, MoKan Dial, Inc., and Northeast Missouri Rural

Telephone Company (“Petitioners”), and hereby requests that the Commission’s standard Protective Order be entered in this case pursuant to 4 CSR 240-2.085.

In support of this Motion, Petitioners state the following:

1. This complaint involves billing issues between Petitioners and Respondents, and will require the exchange of company specific and customer specific billing information. The exchange of such information will enable the parties to understand the nature of the dispute and to facilitate settlement negotiations. If settlement negotiations fail, the information will be necessary to prepare for hearing in this contested case action;

2. The company specific and customer specific billing information is proprietary and highly confidential data that has not been made available to the public. If this information is made available to the public, competitors may use this information against the Respondents to identify and undermine their market share of customers, and competitor or public use of the customer specific information will violate individual customer privacy rights. None of the Petitioners’ company specific and customer specific billing information can be found in any format in any other public document. The Petitioners consider this company specific and customer specific billing information to be proprietary and highly confidential business information.

WHEREFORE, on the basis of the foregoing, Petitioners respectfully request the Commission issue the standard Protective Order in this case.

**ANDERECK, EVANS, MILNE,
PEACE & JOHNSON, L.L.C.**

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ATTORNEYS FOR PETITIONERS

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 25 day of April, 2002, to all attorneys of record in this proceeding.

Lisa Chase
Lisa Cole Chase MO Bar No. 51502