

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

ATTORNEYS AT LAW

EUGENE E. ANDERECK

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

CRAIG S. JOHNSON

RODRIC A. WIDGER

GEORGE M. JOHNSON

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT

COREY K. HERRON

MATTHEW M. KROHN

700 EAST CAPITOL AVENUE

COL. DARWIN MARMADUKE HOUSE

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

LANETTE R. GOOCH

SHAWN BATTAGLER

JOSEPH M. PAGE

LISA C. CHASE

JUDITH E. KOEHLER

ANDREW J. SPORLEDER

REBECCA L. SELLERS

JASON A. PAULSMeyer

BRYAN D. LADE

CONNIE J. BURROWS

OF COUNSEL

MARVIN L. SHARP

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

PHIL HAUCK (1924-1991)

PHIL HAUCK (1924-1991)

April 20, 2004

FILED

APR 20 2004

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

Missouri Public
Service Commission

Re: In the Matter of the Petition of Mogan Dial, Inc. for Modification of the Federal Communications Commission Requirement to Implement Number Portability

Dear Secretary:

Enclosed for filing please find the original and eight copies of the Motion for Protective Order and Petition for Modification of Local Number Portability Obligations and Motion for Expedited Treatment in the above referenced case.

Thank you for seeing this filed. If you should have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Lisa Chase
Lisa C. Chase

LCC:lw

Encl.

CC: Public Service Commission
Office of Public Counsel
Jane Prettyman

Trenton Office
9th And Washington
Trenton, Missouri 64683
660-359-2244
Fax 660-359-2116

Springfield Office
1111 S. Glenstone
P.O. Box 4929
Springfield, Missouri 65808
417-864-6401
Fax 417-864-4967

Princeton Office
207 North Washington
Princeton, Missouri 64673
660-748-2244
Fax 660-748-4405

Smithville Office
119 E. Main Street
P.O. Box. 654
Smithville, Missouri 64089
816-532-3895
Fax 816-532-3899

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of MoKan Dial, Inc.)
for Modification of the)
Federal Communications Commission)
Requirement to Implement Number Portability)

Case No. _____

FILED
APR 20 2004
Missouri Public
Service Commission

MOTION FOR PROTECTIVE ORDER

COMES NOW MoKan Dial, Inc. ("MoKan" 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 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, MoKan respectfully requests that the