

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Confirmation of)	
Adoption of an Interconnection)	
Agreement with CenturyTel of Missouri, LLC)	Case No. CO-2005-0066
d/b/a CenturyTel and Spectra Communications)	
Group, LLC, d/b/a CenturyTel by)	
Socket Telecom, LLC.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Socket Telecom, LLC (“Socket”) pursuant to Rule 4 CSR 240-2.085 and hereby moves the Commission to issue a standard protective order on the following grounds:

1. The Commission has recognized in numerous dockets that there is a genuine need to protect certain confidential information from disclosure. The issuance of protective orders in prior cases has provided a sound method for submitting and exchanging confidential information in pleadings and discovery.

2. In this case, it is likely that certain information that is competitively sensitive and should be protected against public disclosure to protect Socket's legitimate business interests and prevent competitive harm will have to be submitted or exchanged. None of the information for which a legitimate claim of confidentiality can be made would be found in any format in any public document.

3. The Commission should establish its standard protective order.

WHEREFORE, Socket Telecom, LLC, respectfully requests the Commission to issue a protective order in this proceeding.

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 3rd day of November, 2004, by placing same in the U.S. Mail, postage paid and by fax transmission.

/s/ Carl J. Lumley

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