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June 6, 2001

Mr. Dale Roberts
Executive Secretary
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

FILED²
JUN 7 2001
Missouri Public
Service Commission

Re: Motion for a Protective Order

Dear Mr. Roberts:

Enclosed please find an original and nine (9) copies of the Motion for Protective Order filed on behalf of Platinum Equity, LLC.

Please acknowledge receipt of this filing by file stamping the extra copy of this transmittal and returning it in the self-addressed, stamped envelope included for this purpose. Should you have any questions or need anything further, please contact me.

I appreciate your help in this matter.

Sincerely,

Trina R. LeRiche

Trina R. LeRiche

TRL/lsc
Enclosures
cc: Service List

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION

FILED²
JUN 7 2001
Missouri Public
Service Commission

Joint Application of)
Claricom Networks, Inc., Claricom)
Holdings, Inc., Staples, Inc., Stacom)
Holdings, LLC, and)
Platinum Equity, LLC for Approval of)
the Transfer of Stock in Claricom)
Holdings, Inc. to Stacom Holdings, Inc.)

Case No. 7m-2001-669

PLATINUM EQUITY, LLC'S
MOTION FOR A PROTECTIVE ORDER

Comes now Platinum Equity, LLC (hereinafter "Platinum Equity"), and pursuant to Mo. Rev. Stat. § 386.410 and 4 CSR 240-2.085, moves the Commission to issue a protective order regarding confidential and highly proprietary information. In support of this Motion, Platinum Equity states the following:

1. By this Motion, Platinum Equity seeks a protective order prohibiting public disclosure of its Financial Statements and the Purchase and Sale Agreement attached to a Joint Application for Approval of the Transfer of Stock in Claricom Networks, Inc. ("Joint Application"). The Purchase and Sale Agreement is Exhibit 7 and the Financial Statements are Exhibit 8 to the Joint Application. Platinum Equity is a privately-held company, and as such, its Financial Statements and the Purchase and Sale Agreement are not generally subject to public disclosure as would be the case with a public company. Disclosure of this information could result in competitive injury.

2. The services which Platinum Equity provides are in a competitive market. Platinum Equity takes measures to protect the information contained in the Financial Statements and the Purchase and Sale Agreement from public disclosure, as the company believes that it would suffer competitive harm if other companies in the telecommunications industry, especially

the company's competitors, were privy to the information. These documents are not published elsewhere in a public format.

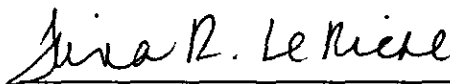
3. In light of the competitive harm which Platinum Equity believes it would suffer as a result of public disclosure of the financial information contained in the Purchase and Sale Agreement and the Financial Statements, Platinum Equity seeks a protective order.

4. None of the parties to the Joint Application oppose this Motion for a Protective Order.

Wherefore, Platinum Equity, LLC moves the Commission for a protective order to prohibit public disclosure of its Purchase and Sale Agreement and Financial Statements.

Respectfully Submitted,

SONNENSCHN NATH & ROSENTHAL



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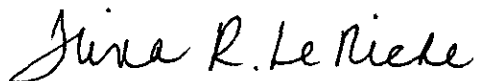
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 6th day of June, 2001, two true and correct copies of the above and foregoing was mailed, postage prepaid, to:

Michael Dandino
Office of Public Counsel
Missouri Public Service Commission
200 Madison Street
Suite 650
Jefferson City, MO 65101

With one copy being mailed postage prepaid, on the same date to:

William K. Haas
Office of General Counsel
Missouri Public Service Commission
200 Madison Street
Suite 800
Jefferson City, MO 65101



ATTORNEYS FOR
PLATINUM EQUITY, LLC