

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

Application of)	
)	
)	
US Cable Telecom of Missouri, LLC)	
)	
for Certificates of Service Authority to Provide)	Case No. _____
Basic Local Exchange and Resold and)	
Facilities-Based Intrastate Interexchange and)	
Non-Switched Local Exchange)	
Telecommunications)	
Services in the State of Missouri and to Classify)	
Those Services and the Company as Competitive)	
)	

MOTION FOR PROTECTIVE ORDER

US Cable Telecom of Missouri, LLC (“US Cable” or “Applicant”), by and through undersigned counsel and pursuant to 4 CSR 240-2.085, hereby moves the Commission to issue a Protective Order covering the attached consolidated financial statements and *pro forma* financial information of US Cable of Coastal Texas, LP (“Parent” and together with Applicant, the “Company”), contained in Exhibits B and C in the above-captioned Application, filed concurrently with this Motion.

Exhibits B and C contain highly sensitive and proprietary financial information. Allowing the Company’s competitors access to this information could put the Company at an extreme competitive disadvantage relative to other companies in the competitive telecommunications industry, especially if these competitors are not required to disclose similar information about their businesses.

In a competitive market, knowledge of a competitor’s financial status can be used to obtain an unfair business advantage. None of the information for which confidentiality is claimed can be

found in any format in any other public document. While the information provided is expected to assist the Commission in reviewing the merits of the Application, the general public has no direct or substantive interest in the information. The financial and business information contained in Exhibits B and C is highly sensitive and subject to protection from disclosure as trade secrets. Moreover, the risks of harm to the Company from disclosure of such information are real, direct, and immediate; and, thus, disclosure would be contrary to the public interest.

WHEREFORE, Applicant respectfully requests that the Missouri Public Service Commission grant it a Protective Order permitting it to file Exhibits B and C to the application under seal and further requests that the above-referenced Exhibits B and C be protected from release to persons and parties outside of the Commission for a period of not less than three (3) years from the date of filing.

Respectfully submitted,

/s/ Mark W. Comley

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Counsel for the Company

Dated: May 29, 2007

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 29 day of May, 2007, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley

Mark W. Comley