#### BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of MCImetro	)	
Access Transmission Services, LLC d/b/a Verizon	)	
Access Transmission Services for Review and	)	Case No. TO-2006-0367
Reversal of the North American Number Plan	)	
Administrator's Decision to Withhold Numbering	)	
Resources.	)	

#### **MOTION FOR PROTECTIVE ORDER**

COMES NOW McImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services ("Verizon") and pursuant to 4 CSR 240-2.085 hereby moves the Commission to issue a standard protective order on the following grounds:

- 1. Verizon has herewith filed its Application and Motion for Expedited Treatment.
- 2. 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 led to the development of a smoother and more orderly discovery procedure, has helped to minimize disputes, and has provided a sound method for submitting confidential information.
- 3. In this case, it is anticipated certain information which is considered to be highly confidential will be involved and this information should not be made public.
  - 4. The Commission should establish its standard protective order.

WHEREFORE, McImetro Access Transmission Services, LLC d/b/a Veizon Access Transmission Services respectfully requests the Commission to issue a protective order.

## Respectfully submitted,

### /s/ Carl J. Lumley

Carl J. Lumley MBE #32869 Leland B. Curtis, MBE #20550 CURTIS, HEINZ, GARRETT & O'KEEFE, P.C. 130 South Bemiston, Suite 200 St. Louis, Missouri 63105 Telephone: (314) 725-8788 Facsimile: (314) 725-8789

Facsimile: (314) 725-8789 clumley@lawfirmemail.com lcurtis@lawfirmemail.com

Attorneys for MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services

# **CERTIFICATE OF SERVICE**

		A ture ar	nd correct c	copy of the	e foregoing	document	was	either	e-mailed,	faxed	or
mailed	this	23rd day of	f March, 20	006 to the	persons on	the attache	d list	t <b>.</b>			

/s/ Carl J. Lumley

Office of Public Counsel P.O. Box 2230 Jefferson City, Missouri 65102 opcservice@ded.mo.gov

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102 gencousel@psc.mo.gov