

MAR 04 2004

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

In the Matter of the Petition of Mid-Missouri)
 Telephone Company for Suspension of the)
 Federal Communications Commission)
 Requirement to Implement Number Portability)

Case No. _____

MOTION FOR PROTECTIVE ORDER

COMES NOW Mid-Missouri Telephone Company ("Mid-Missouri" 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 Suspension and 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, Mid-Missouri respectfully requests

that the Commission issue in this case its standard-form protective containing classifications of "highly confidential" and "proprietary."

Wherefore, Mid-Missouri, pursuant to 4 CSR 240-2.085, requests that the Commission issue the Commission's standard form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case, and grant such further relief as the Commission deems appropriate.

Respectfully submitted,

**ANDERECK, EVANS, MILNE
PEACE & JOHNSON**

By:



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ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 4th day of March, 2004, to the following parties:

General Counsel
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Lisa Cole Chase