BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

Missouri Public Service Commission

FEB 1 6 2000

In the Matter of the Application of O1 Communications of Missouri, LLC for a) Certificate of Service Authority to Provide) Basic Local Telecommunications Service, Local Exchange Telecommunications Service, Interexchange Telecommunications and) Service in the State of Missouri and to) Classify said Services and the Company as) Competitive.

Case No. TA - 2000 - 496

MOTION OF 01 COMMUNICATIONS OF MISSOURI, LLC FOR PROTECTIVE ORDER

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Comes now O1 Communications of Missouri, LLC ("Applicant"), and moves the Commission pursuant to 4 C.S.R. 240-2.080(13), to issue a protective order in this matter with respect to the Applicant's financial information provided in Confidential Exhibit 3 to its Application for a Certificate of Service Authority. In support of its motion, Applicant states as follows:

1. In its Application for a Certificate of Service Authority, Applicant seeks Commission authority to provide basic local telecommunications, local exchange telecommunications, and interexchange telecommunications services on a competitive basis in Missouri. In support of its Application, Applicant has filed Confidential Exhibit 3, which contains competitively sensitive information concerning Applicant's financial condition.

2. Applicant requests that its financial statements be treated as proprietary documents, in that Applicant is a privately-held company and information concerning its financial standing could be used for competitive purposes.

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3. The financial statements are private and confidential financial and business information and, therefore, constitute proprietary information entitled to protection from disclosure under 4 C.S.R. 240-2.080(13).

WHEREFORE, Applicant respectfully requests that the Commission issue its standard protective order in this proceeding with respect to the financial statements attached to Applicant's Application as Confidential Exhibit 3.

Respectfully Submitted,

Mark P. JohnsonMO BAR #30740James D. McMullenMO BAR #49559Sonnenschein Nath & Rosenthal4520 Main Street, Suite 1100Kansas City, MO 64111(816) 932-4400 Telephone(816) 531-7545 Facsimile

ATTORNEYS FOR APPLICANT O1 COMMUNICATIONS OF MISSOURI, INC.

Dated: February 15, 2000

VERIFICATION

STATE OF MISSOURI) ss. COUNTY OF JACKSON

COMES NOW Mark P. Johnson, being of lawful age and duly sworn, swears and affirms as follows:

- 1. My name is Mark P. Johnson and I am the attorney for O1 Communications of Missouri, Inc. In that capacity I am authorized to verify this Motion and the information contained therein on behalf of O1 Communications.
- The information contained in the Motion is true and accurate to the best of my 2. knowledge and belief.

Mark P. Johnson

Subscribed and sworn to before me this 15 day of February, 2000.

Chery Z. Kovich Notary Public

My Commission Expires:

CHERYL L. KOVICH Notary Public - Notary Scal STATE OF MISSOURI **Jackson County** My Commission Expires: Nov. 22, 2000



The undersigned hereby certifies that on this 157 day of February, 2000, a true and correct copy of the above and foregoing was mailed via Federal Express to:

Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102

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