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July 25, 2003

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Mr. Dale Hardy Roberts **Missouri Public Service Commission** P.O. Box 360 Jefferson City, MO 65102

FILEE JUL 2 5 2003. Missou

RE: Case No. \_

Application of Now Acquisition Corporation for Certificate of Service Authority to Provide Basic Local Exchange Telecommunications Services in Portions of Missouri

Dear Mr. Roberts:

Enclosed for filing on behalf of Now Acquisition Corporation, please find an original and five (5) copies of a **"MOTION FOR PROTECTIVE ORDER"** relating to the Application for Certificate of Service Authority filed simultaneously herewith.

Please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

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Enclosures

cc: General Counsel Office of Public Counsel Patrick D. Crocker Mary Ann (Garr) Young

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of

## NOW ACQUISITION CORPORATION

For a Certificate of Service Authority to Provide) Case No. Basic Local Telecommunications Services in Portions of the State of Missouri and for CompetitiveClassification )

FILED-JUL 2 5 2003

Missou

## **MOTION FOR PROTECTIVE ORDER**

NOW COMES Now Acquisition Corporation ("NAC" or "Applicant"), and moves the Commission, pursuant to 4 CSR 240-2.085, to issue a protective order in this matter with respect to financial information provided in conjunction with NAC's Application for certificate of service authority for basic local telecommunications service, which is being filed concurrently herewith. In support of its motion, NAC states as follows:

1. NAC and its parent company, BiznessOnline.com, Inc. are privately held corporations engaged in the provision of telecommunications services which are highly competitive. The public disclosure of financial statements of NAC and its parent company could be injurious to the business and competitive position of these entities.

2. NAC has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. Appendix A-4 to the Application will include highly confidential financial information which will be marked Highly Confidential and late-filed in a sealed envelope at such time as the Commission issues a Protective Order in this case.

3. The financial statements provided with the Application are private and confidential financial and business information, and therefore constitute highly confidential information entitled to protection from disclosure under 4 CSR 240-2.085. None of the information for which Applicant claims confidentiality can be found in any format in any other public document.

. . . . . . .

WHEREFORE, Now Acquisition Corporation respectfully requests that the Commission issue its standard protective order in this proceeding with respect to financial statements to be filed as **Appendix A-4** to NAC's Application for Certificate of Service Authority.

Respectfully submitted,

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William D. Šteinmeier, Mo. Bar #25689Mary Ann (Garr) Young, Mo.Bar #27951WILLIAM D. STEINMEIER, P.C.2031 Tower DriveP.O. Box 104595Jefferson City, MO 65110-4595Tel.: (573) 659-8672Fax: (573) 636-2305Email: wds@wdspc.comMyoung0654@aol.com

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ATTORNEYS FOR APPLICANT NOW ACQUISITION CORPORATION

## Certificate of Service

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to the Office of Public Counsel and the General Counsel's office on this 25th day of July 2003.

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William D. Steinmeier