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September 14, 2001

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Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. TO-2000-374

FILED

SEP 14 2001

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR PROTECTIVE ORDER** and **STAFF'S REPLY TO RESPONSES FROM SOUTHWESTERN BELL TELEPHONE COMPANY AND FROM SPRINT**.

This filing has been mailed or hand-delivered this date to all counsel of record, and to the Co-chairs and attorney for the North American Portability Management LLC.

Thank you for your attention to this matter.

Sincerely yours,

William K. Haas
Deputy General Counsel
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WKH:sw
Enclosure
cc: Counsel of Record

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

In the Matter of the North American)
Numbering Plan Administration's Petition)
for Approval of NPA Relief Plan for the)
314 and 816 Area Codes

Case No. TO-2000-374

MOTION FOR PROTECTIVE ORDER

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. Commission Rule 4 CSR 240-2.085 authorizes a party to file a motion for a protective order to treat information as highly confidential or proprietary.
2. NeuStar has submitted to the Staff a letter setting forth the prices that it would charge the industry to conduct number pooling trials in Missouri. NeuStar asks that the letter be treated as confidential and proprietary.
3. Section 386.480 RSMo 2000 provides that no information furnished to the Commission, except such matters as are specifically required to be open to public inspection by this chapter or by Chapter 610, RSMo, shall be open to public inspection except on order of the Commission, or by the Commission or a Commissioner in the course of a hearing or proceeding.
4. By analogy, the State Sunshine Law allows the government bidding process to be closed to public inspection, thereby recognizing that harm may occur if such information is made public. See § 610.021(11), (12) RSMo 2000.
5. Based on NeuStar's request that the letter be treated as proprietary and confidential, the Staff believes that the information is not available in any other public document.

WHEREFORE, the Staff requests the Commission to issue its standard Protective Order.

Respectfully submitted,

DANA K. JOYCE
General Counsel

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 14th day of September 2001.

Wm K Haas

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Case No. TO-2000-374
Revised: September 14, 2001 (SW)**

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