

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)	
Victory Communications for a Certificate)	Case No. CA-2004-0427
of Service Authority to provide Basic Local)	
Telecommunications Services in portions)	
of the State of Missouri, to classify said)	
services and the company as competitive,)	
and to waive certain statutes and rules.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Victory Communications, Inc. (“Victory”) pursuant to Rule 4 CSR 240-2.085 and hereby moves the Commission to issue a standard protective order on the following grounds:

1. Victory has herewith filed its Application for Certificate of Service Authority to Provide Basic Local Telecommunications Service and for Competitive Classification.

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, certain financial information regarding the company that is submitted with the application is competitively sensitive and should be protected against public disclosure. None of the information for which a claim of confidentiality is made can be found in any format in any public document.

4. The Commission should establish its standard protective order.

WHEREFORE, Victory Communications, Inc. respectfully requests the Commission to issue a protective order.

Respectfully submitted,

Curtis, Oetting, Heinz,
Garrett & O'Keefe, P.C.

/s/ Carl J. Lumley

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ATTORNEYS FOR APPLICANT
Victory Communications, Inc.

Certificate of Service

A true and correct copy of the foregoing document was mailed this 20th day of February, 2004, by placing same in the U.S. Mail, postage paid to:

Office of Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

/s/ Carl J. Lumley
