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June 13, 2002

VIA FEDERAL EXPRESS

Mr. Dale Roberts
Chief ALJ and Executive Secretary
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

Re: CD Telecommunications, LLC – LOCAL EXCHANGE
Case No. TA-2002-453

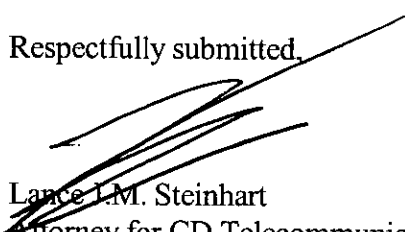
Dear Mr. Roberts:

Pursuant to a letter from John Van Eschen dated June 5, 2002, enclosed please find for filing an original and eight (8) copies of Applicant's response to Mr. Van Eschen letter, along with a Motion for Protective Order for information that is "highly confidential".

The Motion includes one copy of the confidential information in redacted form marked "Non Proprietary Version" and eight (8) copies of the intact confidential information.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self addressed, postage prepaid envelope. If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,



Lance J.M. Steinhart
Attorney for CD Telecommunications, LLC

Enclosures

cc: Tim Sefton
Michael Dandino, Office of Public Counsel
General Counsel, Missouri Public Service Commission



CD Telecommunications, LLC
607 State Hwy. 165 Suite 5
Branson, MO 65616
(417) 239-1399

June 10, 2002

Missouri Public Service Commission
John Van Eschen
Manager, Telecommunications Dept.
Governor Office Building
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360

Regarding Case No TA-2002-453

Dear Mr. Van Eschen;

We received your request for additional information regarding CD Telecommunications application for providing basic local telecommunications service in the state of Missouri. Attached with this letter is the financial information to clarify CD Telecommunications capability to offer this service. We have included a business plan that spells out the capital and expense requirements for CD Telecommunications and a recent bank statement for Eminent Network Technologies that indicates current cash balance for Eminent.

CD Telecommunication is being initially funded by Eminent. Eminent Network Technologies is a successful network and data service provider that has been in operation in Missouri for over four years. CD Telecommunications plan calls for \$41,200 dollars in total expenses in the first four months of business (see business plan attached). Eminent Network Technologies currently has a cash balance of \$48,000 and growing (see statement attached). This will provide financial capability for CD Telecommunications to start and sustain service operations in Missouri.

We hope this package contains the information that you'll need to grant CD Telecommunication a basic local telecommunication service license. We look forward to providing a compelling product at a competitive price to customers throughout our Missouri area.

Please contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc A. Rys".

Marc A. Rys

In the matter of the application)
of CD Telecommunications, LLC)
)
for a certificate of service authority) Case No. TA-2002-453
to provide resold and facilities-based)
Basic Local Telecommunications Services)
in Portions of the State of Missouri and)
to Classify Such Services)
and the Company as Competitive)

CD Telecommunications, LLC (hereinafter "Applicant"), by its attorney and pursuant to Chapter 392 of the Missouri Revised Statutes and the Commission's Rules of Practice and Procedure, hereby moves the Missouri Public Service Commission (the "Commission") for a protective order of non-disclosure precluding public disclosure of certain proprietary, confidential information, to be filed in connection with Applicant's supplemental filing in response to staff request for its Application for a Certificate of Service Authority to provide resold and facilities-based Basic Local telecommunications services in portions of the State of Missouri and to Classify such services and the company as competitive (the "Application") filed with the Commission on this date. In support of its Motion, Applicant provides the following information:

1. The information that Applicant seeks to protect is the financial information attached to the company's response to staff request (the "Protected Information"). The Protected Information consists of a bank statement for Eminent Network Technologies, Inc., and a business plan and financial projections for Applicant, both of which are privately held companies, which are not subject to public reporting requirements. The Protected Information is attached to the response without the Protected Information and is marked with the words "PROPRIETARY INFORMATION" in large letters. A copy of the Protected Information is attached hereto.

2. Applicant respectfully requests that the Protected Information be subject to a protective order of non-disclosure under Commission Rules of Practice and Procedure; that the Protected Information (and any reproduction or copying of any part thereof) be restricted to counsel, and other agents or employees, who have been specifically assigned to this proceeding by the Commission; that the Protected Information be used solely in connection with this proceeding; that the Protected Information used in depositions, prepared testimony or other similar uses will be redacted and submitted under seal; that all Protected Information should be marked "CONFIDENTIAL, SUBJECT TO PROTECTIVE ORDER"; that neither the filing of the Protected Information in this proceeding, nor the furnishing of the Protected Information for review by the General Staff of the

Commission ("Staff") shall be considered a waiver of any right to object upon any ground to the use of introduction into evidence during any proceeding of any Protected Information; and that not later than thirty (30) days following the conclusion of this proceeding by issuance of a final, non-appealable order of this Commission, all Protected Information designed as "CONFIDENTIAL, SUBJECT TO PROTECTIVE ORDER" including all copies in whole or in part thereof, should be returned to Applicant.

3. As grounds for this motion, Applicant states:

(a) The Protected Information is not known outside of Applicant.

(b) The Protected Information is not disseminated within Applicant and is known only by those of Applicant's employees who have a legitimate business need to know and act upon the information.

(c) Applicant has maintained and seeks to preserve the confidentiality of the Protected Information through all appropriate means including the maintenance of appropriate security at its offices, and the filing of this motion.

(d) The disclosure of this Protected Information would cause material damage to the competitive and financial position of Applicant in that it would provide Applicant's competitors with sensitive data respecting to Applicant's sales, customer usage, and financing strategies.

(e) By granting Applicant's motion, there will be no damage to any public interest in disclosure. In fact, the public will be best served by non-disclosure of the Protected Information.

WHEREFORE, CD Telecommunications, LLC requests that the Commission enter an order granting Applicant's motion for protective order of non-disclosure permitting Applicant and requiring Staff to treat the Protected Information in the manner described herein.

Respectfully submitted,
CD Telecommunications, LLC

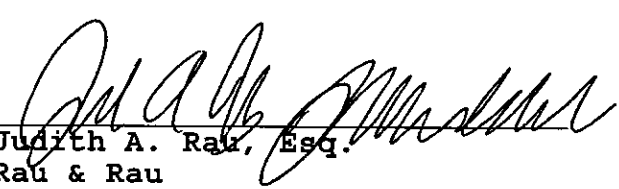
By: _____


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Missouri Bar No. 24856

Attorneys for Applicant

Dated: _____

6/13/02