

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Application of )  
Northwest Missouri Cellular Limited Partnership )  
for Designation as a Telecommunications )  
Company Carrier Eligible for Federal Universal ) Case No. TO-2005-0466  
Service Support Pursuant to § 254 of the )  
Telecommunications Act of 1996. )

**MOTION FOR PROTECTIVE ORDER**

Comes Now NORTHWEST MISSOURI CELLULAR LIMITED PARTNERSHIP (“NWMC” or “Applicant”) by its undersigned counsel and, pursuant to 4 CSR 240-2.085, hereby moves the Commission to adopt a Protective Order for use in the above-captioned matter. In support of this motion, the Applicant states as follows:

1. Applicant has simultaneous with the filing of this Motion submitted its Application for Designation as an Eligible Telecommunications Carrier Pursuant to § 254 of the Telecommunications Act of 1996.

2. Applicant is requesting proprietary and/or highly confidential treatment of certain portions of the Application and appendices. NWMC believes that the designated portions should be protected from disclosure because of the following reasons:

a. Disclosure of certain information could adversely affect NWMC’s business strategy.

b. The designated material may include sensitive financial information and proprietary network information.

c. None of the information for which a claim of confidentiality is made can be found in any format in any other public documents.

5. NWMC believes that disclosure of the confidential portions would cause substantial harm to it and that the potential harm to it outweighs the public's interest in free and open access to such information. The information set forth in the confidential portions are of no particular benefit to the public, but such information could create a commercial and competitive advantage to NWMC's competitors and others in NWMC's industry. Additionally, the harm that would be caused to NWMC by disclosure of the confidential portions would indirectly have an adverse effect on the public and the customers of NWMC.

6. NWMC is not requesting confidential treatment of more material than necessary to protect its business interests. The requested protective order would protect the NWMC's proprietary and confidential information with the least restrictive means of limitation that will provide the necessary protections from disclosure.

WHEREFORE, NWMC respectfully requests that the Commission adopt its standard protective order permitting highly confidential and proprietary information to be maintained under seal in the Commission's files.

Respectfully submitted,

LATHROP & GAGE, L.C.

/s/ Paul S. DeFord

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*Attorneys for Northwest Missouri  
Cellular Limited Partnership*

Dated: June 3, 2005

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Motion for Protective Order has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 3rd day of June, 2005, to:

Dana K. Joyce  
General Counsel  
Missouri Public Service Commission  
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*/s/ Paul S. DeFord*  
Paul S. DeFord