

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

In the Matter of the Third Application of)	
Missouri RSA No. 7 Limited Partnership)	
d/b/a Mid-Missouri Cellular)	
for Designation as a Telecommunications)	
Company Carrier Eligible for Federal Universal)	Case No. TO-2005-0325
Service Support pursuant to § 254 of the)	
Telecommunications Act of 1996.)	

MOTION FOR PROTECTIVE ORDER

Comes Now MISSOURI RSA NO. 7 LIMITED PARTNERSHIP D/B/A MID-MISSOURI CELLULAR (“MMC” or “Applicant”) 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. MMC has also filed its sworn Direct Testimony in support of the Application.

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

a. Disclosure of certain information could adversely affect MMC’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. MMC 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 MMC's competitors and others in MMC's industry. Additionally, the harm that would be caused to MMC by disclosure of the confidential portions would indirectly have an adverse effect on the public and the customers of MMC.

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

WHEREFORE, MMC 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

Paul S. DeFord Mo. #29509
Suite 2800
2345 Grand Boulevard
Kansas City, MO 64108-2612
Telephone: (816) 292-2000
Facsimile: (816) 292-2001

Dated: March 25, 2005

***Attorneys for Missouri RSA No. 7 Limited
Partnership d/b/a Mid-Missouri Cellular***

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 25th day of March, 2005, to:

Dana K. Joyce
General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Charles Brent Stewart
Stewart & Keevil, LLC
Suite 11
4603 John Garry Drive
Columbia, MO 65203
E-mail: Stewart499@aol.com
***Attorneys for Spectra Communications
Group, LLC d/b/a CenturyTel and
CenturyTel of Missouri, LLC***

Kenneth A. Schiffman
MS: KSOPHN0212-2A303
6160 Sprint Parkway
Overland Park, KS 66251
Facsimile: (913) 762-0913
kenneth.schiffman@mail.sprint.com
***Sprint Missouri Inc. and
Sprint Communications Company L.P.***

Michael F. Dandino
Senior Public Counsel
Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102

W.R. England, III
Sondra B. Morgan
Brydon, Swearngen & England, PC
PO Box 456
Jefferson City, MO 65102
Facsimile: (573) 635-0427
E-mail: smorgan@brydonlaw.com
***Attorneys for Alma Communications
Company d/b/a Alma Telephone
Company and Citizens Telephone
Company of Higginsville, Missouri***

/s/ Paul S. DeFord

Paul S. DeFord