

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the matter of the Application of American )  
Broadband and Telecommunications Company )  
d/b/a American Assistance for a Certificate of )  
Service Authority to Provide Basic Local )  
Telecommunications Services, Non-Switched )  
Local Services and ) Case No. \_\_\_\_\_  
Interexchange Telecommunications Services )  
Throughout the State of Missouri and to Classify )  
Said Services and the Company as Competitive )

**MOTION FOR PROTECTIVE ORDER**

COMES NOW American Broadband and Telecommunications Company d/b/a American Assistance (“American Assistance” or the “Company”), pursuant to 4 CSR 240-2.135 and hereby moves the Commission to issue a protective order on the following grounds:

1. Company has herewith filed its Application, which includes attachments that contain confidential information. Such information has been designated proprietary pursuant to Rule 4 CSR 240-2.135.

2. The Commission has recognized in numerous cases that there is a genuine need to protect confidential information from disclosure.

3. In this case, certain information which is considered to be highly confidential or proprietary will be involved and this information should not be made public. Such information is not publicly available in other documents and Company would suffer significant negative business consequences if it were to be made public.

4. The Commission should establish a protective order authorizing the continued confidentiality of the information attached to the Application and similar

information that may be provided with other pleadings in this case, subject to the terms of 4 CSR 240-2.135.

WHEREFORE, American Broadband and Telecommunications Company d/b/a American Assistance respectfully requests the Commission to issue a protective order.

Respectfully submitted,

/s/ Carl J. Lumley

---

Carl J. Lumley #32869  
Curtis, Heinz, Garrett, and O'Keefe P.C.  
130 S. Bemiston Ave., Suite 200  
Clayton, Missouri 63105  
(314) 725-8788  
(314) 725-8789 facsimile  
[clumley@lawfirmemail.com](mailto:clumley@lawfirmemail.com)

Denise N. Smith  
Kelley Drye & Warren LLP  
3050 K Street, NW, Suite 400  
Washington, D.C. 20007  
Tel. (202) 342-8614  
Fax. (202) 342-8451  
[dsmith@kelleydrye.com](mailto:dsmith@kelleydrye.com)

Attorneys for American Broadband and  
Telecommunications Company d/b/a  
American Assistance

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing has been served by forwarding the same by electronic mail and/or first class mail, postage prepaid this 12<sup>th</sup> day of May 2014 to the following:

Office of the Public Counsel  
PO Box 2230  
Jefferson City, Missouri 65102

Office of General Counsel  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, Missouri 65102

\_\_\_\_/s/ Carl J. Lumley\_\_\_\_\_