

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

In the Matter of the Petition)	
For Arbitration of Unresolved)	
Issues Pertaining to a Section 251(b)(5))	Case No. _____
Agreement with Sprint PCS)	

MOTION FOR PROTECTIVE ORDER

COME NOW Ellington Telephone Company, Farber Telephone Company, Goodman Telephone Company, Green Hills Telecommunications Services, Holway Telephone Company, KLM Telephone Company, Le-Ru Telephone Company, Mark Twain Rural Telephone Company, Mark Twain Communications Company, McDonald County Telephone Company, Ozark Telephone Company, Rock Port Telephone Company, and Seneca Telephone Company, (the "Petitioners"), pursuant to 4 CSR 240-2.085 and 240-36.040(6), and move the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Petitioners respectfully state to the Commission as follows:

1. The Verified Petition being filed with the Commission on this same date contains information that Petitioners believe to be Proprietary and/or Highly Confidential. Petitioners also anticipate that discovery during the course of this case may include confidential market information, reports, and workpapers, as well as private technical, financial, and business information. This information is unavailable in any other public document. Therefore, because of the need to conduct discovery and the potential harm to Petitioners and/or Respondents if this information is made public, Petitioners move the Commission to issue its

standard-form protective order so that such information may be designated as “Proprietary” or “Highly Confidential” during the course of arbitration.

WHEREFORE, Petitioners respectfully request that the Commission issue its standard-form protective order for “highly confidential” or “proprietary” information.

Respectfully submitted,

/s/ Brian T. McCartney

W.R. England, III Mo. Bar 23975
Brian T. McCartney Mo. Bar 47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
573/635-7166
573/634-7431 (Fax)
trip@brydonlaw.com
bmccartney@brydonlaw.com

Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic transmission, hand-delivered or mail, United States Mail, postage prepaid, this 4th day of October, 2005, to:

Lewis Mills
Public Counsel
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

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

Fred Broughton
Wholesale and Interconnection Management
Sprint PCS
6450 Sprint Parkway
MS: KSOPHN0116
Overland Park, KS 66251
Fred.Broughton@sprint.com

Jeff Pfaff
Sprint PCS
Jpfaff01@sprintspectrum.com

/s/ Brian T. McCartney
Brian T. McCartney