

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of MCI)	
Communications Services, Inc., d/b/a Verizon)	
Business Services for Review and)	Case No. TO-2006-0478
Reversal of the North American Number Plan)	
Administrator's Decision to Withhold Numbering)	
Resources.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon") and pursuant to 4 CSR 240-2.085 hereby moves the Commission to issue a standard protective order on the following grounds:

1. Verizon has herewith filed its Application and Motion for Expedited Treatment.
2. The Commission has recognized in numerous dockets that there is a genuine need to protect certain confidential information from disclosure. The issuance of protective orders in prior cases has led to the development of a smoother and more orderly discovery procedure, has helped to minimize disputes, and has provided a sound method for submitting confidential information.
3. In this case, certain information which is considered to be highly confidential will be involved and this information should not be made public.
4. The Commission should establish its standard protective order.

WHEREFORE, MCI Communications Services, Inc. d/b/a Verizon Business Services respectfully requests the Commission to issue a protective order.

Respectfully submitted,

/s/ Carl J. Lumley

Carl J. Lumley MBE #32869
Leland B. Curtis, MBE #20550
CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.
130 South Bemiston, Suite 200
St. Louis, Missouri 63105
Telephone: (314) 725-8788
Facsimile: (314) 725-8789
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com

Attorneys for MCI Communications Services, Inc.
d/b/a Verizon Business Services

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was either e-mailed, faxed or mailed this 15th day of June, 2006 to the persons on the attached list.

/s/ Carl J. Lumley

Office of Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102
opcservice@ded.mo.gov

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov