

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the matter of the Application of)	
Western Communications, Inc. for)	
certificates of service authority to)	
provide Basic Local, Local Exchange, Exchange)	
Access, and Interexchange Telecommunications)	Case No.
Services in the State of Missouri and to classify)	
said services and the company as competitive.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Western Communications, Inc. ("Western") pursuant to Rule 4 CSR 240-2.085 and hereby moves the Commission to issue a standard protective order on the following grounds:

1. Western has herewith filed its Application for Certificates of Service Authority to Provide Basic Local, Local Exchange, Exchange Access, and Interexchange Telecommunications Service and for Competitive Classification.

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 financial information regarding the company is competitively sensitive and should be protected against public disclosure. None of the information for which a claim of confidentiality is made can be found in any format in any public document.

4. The Commission should establish its standard protective order.

WHEREFORE, Western Communications respectfully requests the Commission to issue a protective order.



Carl J. Lumley, #32869
Leland B. Curtis, #20550
Curtis, Oetting, Heinz,
Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)
clumley@cohgs.com
lcurtis@cohgs.com

Susan C. Gentz
Bradford W. Bayliff
Casey & Gentz, L.L.P.
919 Congress Avenue, Suite 1060
Austin, Texas 78701
(512) 225-0027
(512) 480-9200 (FAX)
sgentz@phonelaw.com
bbayliff@phonelaw.com

Attorneys for Western
Communications Inc.

Certificate of Service

A true and correct copy of the foregoing document was mailed this 30
day of July, 2002, by placing same in the U.S. Mail, postage paid to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

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

