

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

Big River Telephone Company, L.L.C.; Birch	)	
Telecom of Missouri, Inc.; Ionex	)	
Communications, Inc.; NuVox Communications	)	
of Missouri, Inc.; Socket Telecom, LLC; XO	)	
Communications Services, Inc.; and Xspedius	)	
Communications, L.L.C.,	)	
	)	
Complainants,	)	
	)	
v.	)	Case No. TC-2005-0294
	)	
Southwestern Bell Telephone, L.P., d/b/a SBC	)	
Missouri,	)	
	)	
Respondent.	)	
	)	

**SOUTHWESTERN BELL TELEPHONE L.P.'S,**  
**D/B/A SBC MISSOURI'S MOTION FOR PROTECTIVE ORDER**

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri") and, for its Motion for Protective Order, respectfully requests the Commission to issue its Standard Protective Order in this proceeding. In support of SBC Missouri's Motion for Protective Order, SBC Missouri states as follows:

1. SBC Missouri is currently preparing responses to the Joint Data Requests of the CLEC Coalition.
2. In preparing its response to the Joint Data Requests of the CLEC Coalition, SBC Missouri has determined that certain information should not be made public.
3. Specifically, SBC Missouri anticipates that certain information, although relevant, should not be made public because it is either: (a) "proprietary" in that the

information contains trade secrets, as well as confidential or private technical, financial and business information; or (b) “highly confidential” in that the information concerns: (1) material or documents that contain information relating directly to specific customers; (2) employee-sensitive information; (3) marketing analyses or other market-specific information relating to services offered in competition with others; (4) reports, work papers or other documentation related to work produced by internal or external auditors or consultants; and/or (5) strategies employed, to be employed, or under consideration in contract negotiations.

4. SBC Missouri, therefore, respectfully requests that the Commission issue its Standard Protective Order, which is attached hereto and is marked as Attachment A, so that SBC Missouri’s proprietary and highly confidential information are adequately protected.

WHEREFORE, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri requests that the Commission issue its Standard Protective Order, together with any further and additional relief the Commission deems just and proper.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE,  
L.P.

By: 

PAUL G. LANE #27011  
LEO J. BUB #34326  
ROBERT J. GRYZMALA #32454  
MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone,  
L.P.

One SBC Center, Room 3510

St. Louis, Missouri 63101

314-235-4094 (Telephone)

314-247-0014 (Facsimile)

[mm8072@momail.sbc.com](mailto:mm8072@momail.sbc.com) (E-Mail)

**CERTIFICATE OF SERVICE**

Copies of this document were served on all counsel of record by e-mail on March 18, 2005.

  
Mimi B. MacDonald

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

Public Counsel  
Office of Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102

Carl J. Lumley  
Leland B. Curtis  
CURTIS OETTING HEINZ GARRETT &  
SOULE, P.C.  
130 S. Bemiston, Suite 200  
St. Louis, MO 63105

Bill Magness  
Casey & Gentz, L.L.P.  
98 San Jacinto Blvd., Suite 1400  
Austin, TX 78701

Mark P. Johnson  
Sonnenschein Nath & Rosenthal LLP  
4520 Main Street, Suite 1100  
Kansas City, MO 654111

Mark W. Comley  
Newman, Comley & Ruth  
601 Monroe Street, Suite 301  
PO Box 537  
Jefferson City, MO 65102

Michell Bourianoff  
AT&T Communications of the Southwest,  
Inc.  
919 Congress, Suite 900  
Austin, TX 78701