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March 24, 2000

VIA RUSH DELIVERY

Mr. Dale Roberts
Executive Secretary
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65101

FILED²

MAR 27 2000

Missouri Public
Service Commission
TA-2000-600

RE: *In the Matter of the Application of Ionex Communications, Inc., for a Certificate of Service Authority to Provide Basic Local Telecommunications Service, for Waiver of Certain Statutory and Regulatory Provisions, and for Designation as a Competitive Telecommunications Company*

Dear Mr. Roberts:

Please find enclosed for filing the original and 14 copies of the following:

1. Application of Ionex Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service and for Designation as a Competitive Telecommunications Company; and
2. Motion of Ionex Communications, Inc. for a Protective Order with respect to Exhibit D of the Application.

Also enclosed are eight copies of Confidential Exhibit D to be filed under seal.

By copy of this letter, two copies of the enclosed have been forwarded to the Office of Public Counsel and one copy of the enclosed to the Office of General Counsel via Federal Express. I have enclosed two additional sets of the application and motion and would appreciate your stamping those "filed" and returning them to me in the enclosed return envelope.

Very truly yours,

Todd M. McGuire /cmw

Todd M. McGuire

TMM/cmw

Enclosures

cc: Office of Public Counsel (w/encl.) (via Federal Express)
Office of General Counsel (w/encl.) (via Federal Express)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAR 27 2000

Missouri Public
Service Commission

In the Matter of the Application of Ionex)
Communications, Inc., for a Certificate of)
Service Authority to Provide Basic Local)
Telecommunications Service, for Waiver of)
Certain Statutory and Regulatory Provisions,)
And for Designation as a Competitive)
Telecommunications Company.)

Case No. TA 2000-600

**MOTION OF IONEX COMMUNICATIONS, INC.
FOR PROTECTIVE ORDER**

Comes now Ionex Communications, Inc. ("Ionex"), and moves the Commission pursuant to 4 C.S.R. 240-2.080(13), to issue a protective order in this matter with respect to Ionex's financial information provided in Confidential Exhibit D to its Application for a Certificate of Service Authority and for Competitive Classification. In support of its motion, Ionex states as follows:

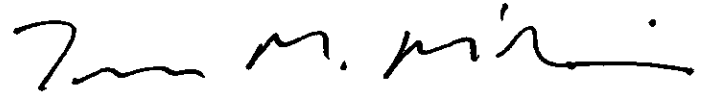
1. In its Application for a Certificate of Service Authority and for Competitive Classification, Ionex seeks Commission authority to provide basic local telecommunications services on a competitive basis in Missouri. In support of its Application, Ionex has filed Confidential Exhibit D, which contains competitively sensitive information concerning Ionex's financial condition.

2. Ionex requests that its financial statements be treated as proprietary documents, in that release of this information to the public could competitively harm and disadvantage Ionex.

3. The financial statements are private and confidential financial and business information and, therefore, constitute proprietary information entitled to protection from disclosure under 4 C.S.R. 240-2.080(13).

WHEREFORE, Ionex Communications, Inc. respectfully requests that the Commission issue its standard protective order in this proceeding with respect to the financial statements attached to Ionex's Application as Confidential Exhibit D.

Respectfully submitted,



Mark P. Johnson, MO Bar No. 30740
Lisa C. Creighton, MO Bar No. 42194
Todd M. McGuire, MO Bar No. 51361
Sonnenschein Nath & Rosenthal
4520 Main Street, Suite 1100
Kansas City, Missouri 64111
(816) 932-4400 (Telephone)
(816) 531-7545 (Facsimile)

ATTORNEYS FOR IONEX
COMMUNICATIONS, INC.

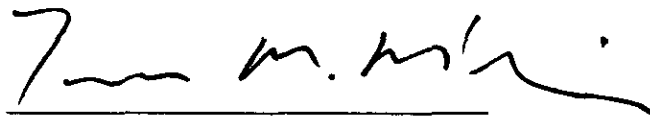
Dated: March 24, 2000

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)


· COMES NOW Todd M. McGuire, being of lawful age and duly sworn, swears and affirms as follows:

1. My name is Todd M. McGuire, and I am the attorney for Ionex Communications, Inc. In that capacity I am authorized to verify this Motion and the information contained therein on behalf of Ionex Communications, Inc.
2. The information contained herein is true and accurate to the best of my knowledge and belief.



Todd M. McGuire

Subscribed and sworn to before me this 24th day of March, 2000.



Notary Public

My Commission Expires:

**CARMEN M. WESSON
NOTARY PUBLIC STATE OF MISSOURI
CLAY COUNTY
MY COMMISSION EXP. MARCH 23, 2000**

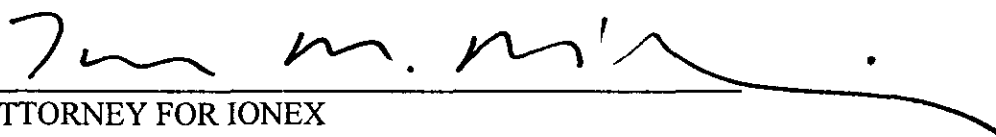
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 24th day of March, 2000, two true and correct copies of the above and foregoing were forwarded via Federal Express to:

Office of Public Counsel
301 West High Street
Suite 250
Jefferson City, Missouri 65101

With one copy being forwarded via Federal Express on the same date to:

Office of General Counsel
Missouri Public Service Commission
301 West High Street
Room 530
Jefferson City, Missouri 65101



ATTORNEY FOR IONEX
COMMUNICATIONS, INC.