

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

In the Matter of a Request for Expansion of)	
the St. Louis Metropolitan Calling Area Plan to)	
Include the Exchanges of Washington, Union,)	Case No. TO-2005-0141
Wright City, St. Clair, Marthasville, Beaufort,)	
Foley, and Warrenton.)	

SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A AT&T MISSOURI'S
MOTION FOR PROTECTIVE ORDER

COMES NOW Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri") and, for its Motion for Protective Order, respectfully requests the Commission to issue its Standard Protective Order in this proceeding. In support of AT&T Missouri's Motion for Protective Order, AT&T Missouri states as follows:

1. AT&T Missouri is currently preparing responses to Data Requests propounded by the Staff of the Missouri Public Service Commission.
2. In preparing its Response to Staff's Data Requests, AT&T Missouri has determined that certain information should not be made public.
3. Specifically, AT&T 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. AT&T Missouri, therefore, respectfully requests that the Commission issue its Standard Protective Order, which is attached hereto and is marked as Attachment A, so that AT&T Missouri's proprietary and highly confidential information are adequately protected.

WHEREFORE, Southwestern Bell Telephone, L.P., d/b/a AT&T 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.

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties via e-mail on January 6, 2006.



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