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December 10, 2002

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

FILED²
DEC 10 2002
Missouri Public
Service Commission

Re: BPS Telephone Company, Case No. IO-2002-0012

Dear Mr. Roberts:

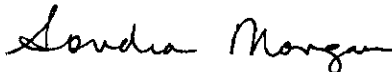
Enclosed for filing on behalf of BPS Telephone Company, please find an original and eight (8) copies of a Motion for Protective Order.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 

Sondra B. Morgan

SBM/lar
Enclosure

cc: General Counsel
Michael F. Dandino
Mr. David Carson

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

FILED²
DEC 10 2002
**Missouri Public
Service Commission**

In the Matter of BPS Telephone)	
Company's Election to be Regulated)	
under Price Cap Regulation as Provided)	Case No. IO-2003-0012
in Section 392.245, RSMo 2000.)	

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now BPS Telephone ("BPS") and moves the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, BPS respectfully states to the Commission as follows:

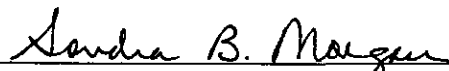
1. On July 22, 2002, the Commission issued its Notice of Price Cap Election and opened this proceeding to accept responses to the price cap election filed by BPS on July 17, 2002. Both the Staff of the Commission and the Office of Public Counsel filed responses.
2. On November 25, 2002, the Commission issued an Order Adopting Procedural Schedule according to which the parties are to file simultaneous direct testimony on December 17, 2002. Because BPS anticipates that the parties' testimony may contain confidential and proprietary information regarding customers of both BPS and the competitive local exchange telecommunications company providing service in its area, BPS requests that the Commission issue a Protective Order so that documents may be filed using the "proprietary" and "highly confidential" designations.
3. BPS anticipates that none of the information for which a claim of confidentiality will be made can be found in any format in any other public document.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place, BPS moves the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, BPS respectfully requests that the Commission:

- (a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and,
- (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



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Attorneys for BPS Telephone Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 10th day of December, 2002, to the following parties:

Mr. Cliff Snodgrass
Senior Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael F. Dandino
Office of Public Counsel
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Sondra B. Morgan