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April 6, 2004

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Mr. Dale Hardy Roberts
Chief Regulatory Law Judge and Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Case No.

Application of Pacific Centrex Services, Inc. for Certificate of Service Authority to Provide Basic Local Exchange Telecommunications Services in Portions of Missouri

Dear Mr. Roberts:

Enclosed for filing on behalf of Pacific Centrex Services, Inc., please find an original and five (5) copies of a "MOTION FOR PROTECTIVE ORDER" in the above-styled case.

Please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

William D. Steinmeier

Enclosures

cc: General Counsel

Office of Public Counsel

Patrick D. Crocker

Mary Ann (Garr) Young

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of the Application of		
PACIFIC CENTREX SERVICES, INC.))	
for Certificate of Service Authority)) Coop No	
to Provide Basic Local Exchange Telecommunications Services) Case No)	
Within the State of Missouri)	
and for Competitive Classification)	

MOTION FOR PROTECTIVE ORDER

Comes now Pacific Centrex Services, Inc. ("PCS" or "Applicant"), by its undersigned counsel, and pursuant to 4 CSR 240-2.085, moves the Commission to issue a protective order in this matter with respect to financial information provided in conjunction with PCS's Application for certificate of service authority for basic local telecommunications service, which is being filed concurrently herewith. In support of its motion, PCS states as follows:

- Pacific Centrex Services, Inc. is a privately held corporation engaged in the provision of telecommunications services which are highly competitive. The public disclosure of financial statements of PCS could be injurious to its business and competitive position.
- 2. Applicant has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. Exhibit C to the Application will include highly confidential financial information which will be marked "Highly Confidential" and late-filed in a sealed envelope at such time as the Commission issues a Protective Order in this case.
- 3. The financial statements to be provided in support of the Application are private and confidential financial and business information, and therefore constitute

highly confidential information entitled to protection from disclosure under 4 CSR 240-2.085. None of the information for which Applicant claims confidentiality can be found in any format in any other public document.

WHEREFORE, Pacific Centrex Services, Inc. respectfully requests that the Commission issue its standard protective order in this proceeding with respect to financial statements to be filed as Exhibit C to PCS's Application for Certificate of Service Authority.

Respectfully submitted,

William D. Steinmeier Mary Ann (Garr) Young

Mo.Bar #25689 Mo. Bar #27951

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COUNSEL FOR PACIFIC CENTREX SERVICES, INC.

Dated:

April 6, 2004

Certificate of Service

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to the Office of Public Counsel and the General Counsel's office on this 6th day of April 2004.

William D. Steinmeier