

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of New London     )  
Telephone Company, Orchard Farm             )  
Company and Stoutland Telephone Company     )  
for Suspension of the Federal                 )  
Communications Commission Requirement       )  
to Implement Number Portability               )

Case No. TO-2004-0370

**Motion for Protective Order**

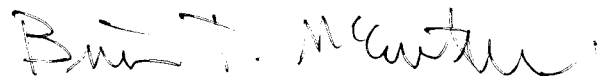
COME NOW New London Telephone Company, Orchard Farm Telephone Company, and Stoutland Telephone Company (Petitioners), by counsel, in accordance with 4 CSR 240-2.085, and, for their motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, state as follows:

1. Petitioners have filed a Petition for Suspension of the Federal Communications Commission (FCC) requirements for wireline-to-wireless Local Number Portability (LNP).
2. Petitioners plan to file company-specific information to support their Petition that may include competitive pricing information, employee-specific information, and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in filings or testimony by other parties may contain customer-specific information, competitive pricing information, trade secrets, and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. None of the information can be found in any other public document, and public disclosure of the referenced material which the Commission's Staff, the Office of Public Counsel, and/or Intervenors may seek in discovery may tend to harm the interests of the Companies, their employees, and their customers.

3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, Petitioners respectfully request that the Commission issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Petitioners, pursuant to 4 CSR 240-2.085, request 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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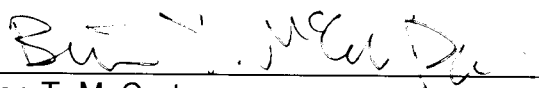
Attorneys for Petitioner

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 8th day of April, 2004, to the following parties:

Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102



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Brian T. McCartney