

WILLIAM D. STEINMEIER, P.C.

2031 TOWER DRIVE
JEFFERSON CITY, MISSOURI (MO) 65109

WILLIAM D. STEINMEIER
ATTORNEY AT LAW
GOVERNMENTAL CONSULTANT
(573) 659-8672
FAX (573) 636-2305

MAILING ADDRESS:
POST OFFICE BOX 104595
JEFFERSON CITY, MISSOURI (MO)
65110-4595

MARY ANN YOUNG
ATTORNEY AT LAW
OF COUNSEL
(573) 634-8109
FAX (573) 634-8224

October 29, 2003

FILED

OCT 29 2003

Missouri Public
Service Commission

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

RE: Case No. _____
Application of Nexus Communications, Inc. d/b/a TSI 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 Nexus Communications, Inc. d/b/a TSI,
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.

By: 
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

FILED

OCT 29 2003

In the matter of the Application of)
)
Nexus Communications, Inc.)
d/b/a TSI)
)
for Certificate of Service Authority)
to Provide Basic Local Exchange)
Telecommunications Services)
Within the State of Missouri)
and for Competitive Classification)

MISSOURI
COMMUNICATIONS
COMMISSION

Case No. _____

MOTION FOR PROTECTIVE ORDER

COMES NOW Nexus Communications, Inc. d/b/a TSI ("Nexus" or "Applicant"), and moves the Commission, pursuant to 4 CSR 240-2.085, to issue a protective order in this matter with respect to financial information provided in conjunction with Nexus' Application for certificate of service authority for basic local telecommunications service; which is being filed concurrently herewith. In support of its motion, Nexus states as follows:

1. Nexus is a closely-held corporation engaged in the provision of telecommunications services which are highly competitive. The public disclosure of financial statements of Nexus could be injurious to its business and competitive position.

2. Nexus has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. **Late-filed 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

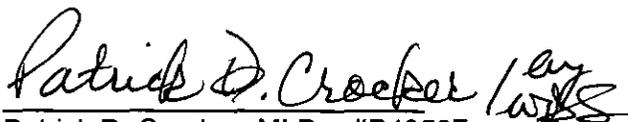
highly confidential information entitled to protection from disclosure under 4 CSR 240-2.085. None of the information for which Applicant claims confidentiality can be found in any format in any other public document.

WHEREFORE, Nexus Communications, Inc. d/b/a TSI respectfully requests that the Commission issue its standard protective order in this proceeding with respect to financial statements to be filed as **Late-Filed Exhibit C** to Nexus' Application for Certificate of Service Authority.

Respectfully submitted,



William D. Steinmeier, Mo. Bar #25689
Mary Ann (Garr) Young, Mo. Bar #27951
WILLIAM D. STEINMEIER, P.C.
2031 Tower Drive
P.O. Box 104595
Jefferson City, MO 65110-4595
Tel.: (573) 659-8672
Fax: (573) 636-2305
Email: wds@wdspsc.com
Myoung0654@aol.com



Patrick D. Crocker, MI Bar #P43527
Early, Lennon, Crocker
& Bartosiewicz, P.L.C.
900 Comerica Building
Kalamazoo, MI 49007
Tel.: (269) 381-8844
Fax: (269) 381-8822
Email: pcrocker@earlylennon.com

ATTORNEYS FOR APPLICANT,
NEXUS COMMUNICATIONS, INC.
D/B/A TSI

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 29th day of October 2003.


William D. Steinmeier