

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

In the Matter of a Request for the Modification)	
Of the Kansas City Metropolitan Calling Area Plan)	Case No. TO-2005-0144
To Make the Greenwood Exchange Part of the)	
Mandatory MCA Tier 2)	

SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A SBC MISSOURI'S
MOTION FOR PROTECTIVE ORDER

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri") and, for its Motion for Protective Order, respectfully requests the Commission to issue its Standard Protective Order in this proceeding. In support of SBC Missouri's Motion for Protective Order, SBC Missouri states as follows:

1. SBC 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, SBC Missouri has determined that certain information should not be made public.
3. Specifically, SBC 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 other; (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. SBC Missouri, therefore, respectfully requests that the Commission issue its Standard Protective Order, which is attached hereto and is marked as Attachment A, so that SBC Missouri's proprietary and highly confidential information are adequately protected.

WHEREFORE, Southwestern Bell Telephone, L.P., d/b/a SBC 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 October 20, 2005.


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