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October 3, 2002

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

**FILED<sup>3</sup>**  
OCT 03 2002

**Re: TT-2003-0043**

Missouri Public  
Service Commission

Dear Mr. Roberts:


Enclosed for filing on behalf of Spectra Communications Group, LLC ("Spectra"), please find an original and eight (8) copies of a Motion for Issuance of a 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: Eric Anderson  
Michael Dandino  
Carl J. Lumley  
Stephen F. Morris  
Rebecca B. DeCook  
J. Steve Weber

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

**FILED<sup>3</sup>**  
OCT 03 2002

In the matter of the Tariff of Spectra	)	
Communications Group, LLC, PSC	)	Case No. TT-2003-0043
MO No. 2, Facilities for Intrastate	)	Tariff No. 200300034
Access.		

Missouri Public  
Service Commission

**MOTION FOR ISSUANCE OF A PROTECTIVE ORDER**

Comes now Spectra Communications Group, LLC ("Spectra") and pursuant to rule 4 CSR 240-2.085 moves the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Spectra respectfully states to the Commission as follows:

1. On July 12, 2002, Spectra filed tariff revisions to its PSC MO No.2 "Facilities for Intrastate Access" tariff designed to change deposit regulations related to its ability to request security deposits from carriers whose credit worthiness had fallen below commercially acceptable levels. This tariff bore an effective date of August 11, 2002.

2. On August 7, MCI WorldCom Communications, Inc. ("WorldCom") filed a Motion to Suspend the tariff. On August 8, the Commission issued its Order Suspending Tariff for thirty (30) days, and on September 5 the Commission issued an Order Further Suspending Tariff, Directing Notice, and Scheduling Prehearing Conference. In this Order the tariff was suspended until December 9, 2002.

3. On September 30, the parties met in prehearing conference and agreed on a procedural schedule. In this conference the parties also discussed the necessity for discovery. Because Spectra anticipates that there may be requests for discovery of information that the company will consider "proprietary" or "highly confidential," it requests that the Commission

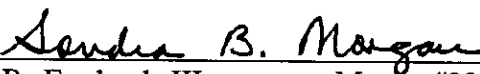
issue a Protective Order so that these documents may be treated in accordance with the terms of the Commission's rule regarding confidential or proprietary information. Public disclosure of this information to potential competitors could cause substantial harm to Spectra. None of the information for 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 confidential information without a protective order in place, Spectra moves the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Spectra 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 Spectra Communications Group, LLC.

### 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 3rd day of October, 2002, to the following parties:

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

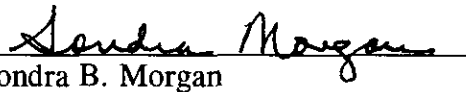
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