

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

August 8, 2003

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

FILED³

AUG 08 2003

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

Missouri Public
Service Commission

RE: Case No. _____

Application of Tele-Reconnect, Inc. for Certificate of Service Authority to
Provide Basic Local Exchange Telecommunications Services Within the
State of Missouri and for Competitive Classification

Dear Mr. Roberts:


Enclosed for filing on behalf of Tele-Reconnect, Inc., please find an
original and five (5) copies of a "**MOTION FOR PROTECTIVE ORDER**" relating
to the Application for Certificate of Service Authority filed simultaneously
herewith.

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
Mary Ann (Garr) Young

FILED³

AUG 08 2003

BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of the Application of)
)
Tele-Reconnect, Inc.)
)
for Certificate of Service Authority)
to Provide Basic Local Exchange)
Telecommunications Services)
Within the State of Missouri)
and for Competitive Classification)

Case No. _____

MOTION FOR PROTECTIVE ORDER

Comes now Tele-Reconnect, Inc. ("Tele-Reconnect" 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 Tele-Reconnect's Application for certificate of service authority for basic local telecommunications service, which is being filed concurrently herewith. In support of its motion, Tele-Reconnect states as follows:

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

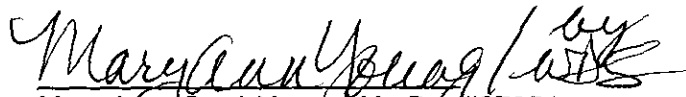
2. Applicant has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. Exhibit C to the Application will include highly confidential financial information which will be marked Highly Confidential and late-filed in a sealed envelope 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, Tele-Reconnect, 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 Tele-Reconnect's Application for Certificate of Service Authority.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Mary Ann Young", with a large, stylized initial "W" or "S" at the end.

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) 634-8109

Fax: (573) 634-8224

Email: Myoung0654@aol.com

COUNSEL FOR APPLICANT
TELE-RECONNECT, INC.

Dated: August 8, 2003

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 8th day of August 2003.

A handwritten signature in cursive script, reading "William D. Steinmeier". The signature is written in dark ink and is positioned above the printed name.

William D. Steinmeier

For Mary Ann Young

William D. Steinmeier, P.C.