

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of BPS)
Telephone Company for Suspension of the) Case No. _____
Federal Communications Commission)
Requirement to Implement Number Portability)

Motion for Protective Order

COMES NOW BPS Telephone Company (BPS, Company, or Petitioners), by counsel, in accordance with 4 CSR 240-2.085, and, for its motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, states as follows:

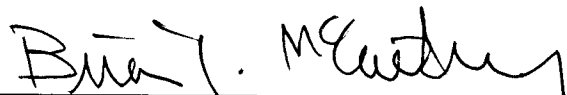
1. Concurrently with this motion, Petitioner has filed a Petition for Suspension of the Federal Communications Commission (FCC) requirements for wireline-to-wireless Local Number Portability (LNP).

2. Petitioner plans to file company-specific information to support this 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 Company, its employees, and its customers.

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

WHEREFORE, BPS, pursuant to 4 CSR 240-2.085, 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,



W.R. England, III MBE #23975
Brian T. McCartney MBE #47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
trip@brydonlaw.com
bmccartney@brydonlaw.com

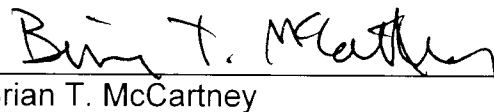
Attorneys for
BPS Telephone Company

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 22nd day of March, 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



Brian T. McCartney