

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

In the Matter of a Repository Docket)	
In which to Gather Information)	<u>Case No. TO-2020-0352</u>
Section 54.314 Certification)	

**STAFF MOTION TO PRESERVE CONFIDENTIALITY
AND REQUEST EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Preserve Confidentiality* states as follows:

1. Previously Staff asked the Commission to open a repository docket to permit the gathering of information from Missouri eligible telecommunications carriers (ETCs) related to federal Section 54.314 certification. The Commission has not yet issued an order in this regard, however, Staff has discussed the schematics of confidentiality with the Commission's Data Center and now asks the Commission to order certain measures to preserve the confidentiality of the information to be provided in this docket.

2. As previously stated, pursuant to Commission rule 20 CSR 4240-2.135(2)(A), certain information is permitted to remain confidential if it falls into the list of categories included in that rule, specifically if anything to be provided to the Commission would constitute a trade secret of the Company. Staff is certain that in the course of its investigation in this docket, the information provided by the Companies will amount to trade secrets and other materials that it would not be proper to permit review of the other telecommunications companies included in this docket.

3. Previously Staff asked for a protective order for each designated ETC as to each other ETC included in this docket. Staff now asks the Commission to specifically direct that each identified ETC be made a party to this docket and that the data request

(DR) responses provided by each ETC/party be restricted by the Data Center from the view of each other ETC/party.

4. Staff previously provided a list of all Missouri companies designated as ETCs eligible to receive federal high-cost support as Attachment A to its initial *Motion*. Each of those ETCs should be made a party to this docket and service should be provided to each as well.

5. In the interest of time, Staff would also ask the Commission to give these considerations expedited treatment so that Staff may begin its investigation as soon as possible.

WHEREFORE, Staff asks the Commission to open this repository docket for the purposes of conducting discovery and retrieving information from the eligible telecommunications carriers in Missouri; to make each designated ETC a party to this docket and provide them service; to direct the Data Center to restrict the responses to any data requests from viewing by other parties to this docket pursuant to 20 CSR 4240-2.135(1)(A); to treat these requests with expedited treatment; and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 19th day of May, 2020, to all counsel of record.

/s/ Whitney Payne