

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

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

June 24, 2002

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

RE: TA-2002-\_\_\_\_\_

Application of Xspedius Management Co. Switched Services, LLC, for a Certificate of Service Authority to Provide Basic Local Exchange Telecommunications Service – Motion for Protective Order

Dear Mr. Roberts:

Enclosed for filing on behalf of Xspedius Management Co. Switched Services, LLC please find an original and eight (8) 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.

Copies of this filing are being hand-delivered, or sent via postage-prepaid U.S. mail, to the Office of Public Counsel and the Commission's General Counsel's office.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

By:   
William D. Steinmeier

Enclosures

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

In the matter of the Application of )  
 )  
**Xspedius Management Co. Switched** )  
**Services, LLC** ) Case No. \_\_\_\_\_ )  
 )  
for a certificate of service authority to provide Basic )  
Local Telecommunications Service in portions of the )  
State of Missouri and for competitive classification )

**MOTION FOR PROTECTIVE ORDER**

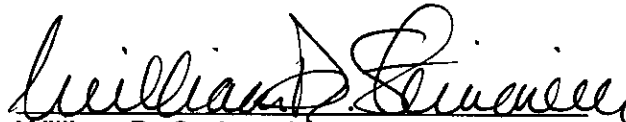
Comes Now Xspedius Management Co. Switched Services, LLC ("Xspedius" or "Applicant"), and moves the Commission, pursuant to 4 CSR 240-2.085, to issue a protective order in this matter with respect to financial information provided in conjunction with Xspedius's Application for certificate of service authority for basic local telecommunications service, which is being filed concurrently herewith. In support of its motion, Xspedius states as follows:

1. Xspedius and its parent company Xspedius Management Co., LLC are privately held corporations engaged in the provision of telecommunications services which are highly competitive. The public disclosure of financial statements of Xspedius and its parent company could be injurious to the business and competitive position of these entities.

2. Xspedius has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. **Exhibit C** to the Application includes highly confidential financial information which has been marked Highly Confidential and filed in a sealed envelope. In accordance with 4 CSR 240-2.085(2), one original and eight sets of the public version of the

WHEREFORE, Xspedius respectfully requests that the Commission issue its standard protective order in this proceeding with respect to financial statements filed as **Exhibit C** to Xspedius's Application for Certificate of Service Authority.

Respectfully submitted,



William D. Steinmeier Mo. Bar #25689  
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) 659-8672  
Fax: (573) 636-2305  
E-mail: wds@wdspc.com

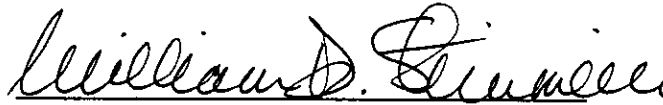


Brad Mutschelknaus D.C. Bar #332262  
Enrico C. Soriano D.C. Bar #451810  
Winafred Brantl VA Bar #46683  
KELLEY DRYE & WARREN LLP  
1200 19<sup>th</sup> Street, N.W., Fifth Floor  
Washington, D.C. 20036  
(202) 955-9600  
(202) 955-9792 (facsimile)  
bmutschelknaus@kelleydrye.com  
esoriano@kelleydrye.com  
WBrantl@kelleydrye.com

COUNSEL FOR XSPEDIUS  
MANAGEMENT CO. SWITCHED  
SERVICES, LLC

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 24th day of June 2002.

A handwritten signature in cursive script that reads "William D. Steinmeier". The signature is written in black ink and is positioned above the printed name.

William D. Steinmeier