

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

Petition for Suspension of the Federal	)	
Communications Commission Requirement	)	
to Implement Wireline/Wireless Number	)	<b>Case No. TO-2004-0232</b>
Portability, under 47 U.S.C. § 251(f)(2)	)	

**MOTION FOR PROTECTIVE ORDER  
AND  
MOTION FOR EXPEDITED TREATMENT**

COMES NOW Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra") and CenturyTel of Missouri, LLC ("CenturyTel") (hereinafter collectively referred to as "Petitioners"), pursuant to 4 CSR 240-2.085 and 4 CSR 240-2.080(16), and hereby respectfully move the Missouri Public Service Commission (Commission) for issuance of the Commission's standard-form protective order in this proceeding, and further move that such action occur prior to December 19, 2003. In support of their Motions, Petitioners state as follows:

1. On December 11, 2003, the Commission issued its Order Directing Filings in this matter, directing Petitioners to "file documentation supporting their Petition for Suspension." This filing is to be made no later than December 19, 2003.

2. Petitioners' responses to this Order may include competitive pricing 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 Petitioners, their employees, and their customers.

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

4. As stated in Paragraph 1, *supra*, the Commission’s December 11<sup>th</sup> Order Directing Filings requires Petitioners to file documentation supporting their Petition for Suspension by December 19, 2003. Accordingly, Petitioners respectfully request the Commission to issue its standard-form protective order prior to that date.

5. As fully set forth in Paragraphs 2 and 3, *supra*, Petitioners submit that competitive harm will be avoided, benefits will accrue and there will be no negative effect on Petitioners’ customers or the general public if the Commission acts by the requested date. Petitioners respectfully submit that this pleading was filed as soon as it could have been.

WHEREFORE, Petitioners respectfully request 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) issue such protective order on an expedited basis, prior to the December 19, 2003 filing date previously ordered herein.

Respectfully submitted,

/s/ Larry W. Dority

---

James M. Fischer	Mo. Bar 27543
------------------	---------------

Email: jfischerpc@aol.com
---------------------------

Larry W. Dority	Mo. Bar 25617
-----------------	---------------

Email: lwdority@sprintmail.com
--------------------------------

FISCHER & DORITY, P.C.

101 Madison, Suite 400

Jefferson City, MO 65101

Tel: (573) 636-6758

Fax: (573) 636-0383

Attorneys for Spectra Communications Group, LLC  
d/b/a CenturyTel and CenturyTel of Missouri, 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, e-mailed or hand-delivered, on this 16th day of December, 2003, to the following parties:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Michael F. Dandino  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

Lisa Creighton Hendricks  
6391 Sprint Parkway  
Mailstop: KSOPHN0212-2A253  
Overland Park, Kansas 66251

William K. Haas  
Deputy General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

/s/ Larry W. Dority

---

Larry W. Dority