ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

ATTORNEYS AT LAW

EUGENE E. ANDERECK
TERRY M. EVANS
ERWIN I. MILNE

ERWIN L. MILNE JACK PEACE

CRAIG S. JOHNSON RODRIC A. WIDGER GEORGE M. JOHNSON BEVERLY J. FIGG WILLIAM S. LEWIS

VICTOR S. SCOTT
COREY K. HERRON
MATTHEW M. KROHN

700 EAST CAPITOL AVENUE COL. DARWIN MARMADUKE HOUSE

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438 TELEPHONE 573-634-3422

FAX 573-634-7822

March 15, 2004

LANETTE R. GOOCH

SHAWN BATTAGLER JOSEPH M. PAGE

LISA C. CHASE JUDITH E. KOEHLER ANDREW J. SPORLEDER

REBECCA L. SELLERS JASON A. PAULSMEYER

BRYAN D. LADE CONNIE J. BURROWS

OP COUNSEL

MARVIN L. SHARP

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)
PHIL HAUCK (1924-1991)

PHIL HAUCK (1924-1991)

Secretary

Public Service Commission P.O. Box 360

Jefferson City, Missouri 65102

Missouri Public Service Commission

FILED

MAR 1 5 2004

Re:

Motion for Protective Order In the Matter of Chariton Valley Telephone Corporation for Modification of the Federal Communications Commission

Requirement to Implement Number Portability

Dear Secretary:

Enclosed please find an original and eight copies of the Motion for Protective Order In the Matter of Chariton Valley Telephone Corporation for Modification of the Federal Communications Commission Requirement to Implement Number Portability.

Thank you for seeing this filed.

Sincerely,

Lisa C. Chase

LCC:lw

Encl.

CC:

Public Service Commission Office of Public Counsel

Trenton Office 9th And Washington Trenton, Missouri 64683 660-359-2244 Fax 660-359-2116 Springfield Office 1111 S. Glenstone P.O. Box 4929 Springfield, Missouri 65808 417-864-6401 Fax 417-864-4967 Princeton Office 207 North Washington Princeton, Missouri 64673 660-748-2244 Fax 660-748-4405 Smithville Office 119 E. Main Street P.O. Box. 654 Smithville, Missouri 64089 816-532-3895 Fax 816-532-3899

FILED MAR 1 5 2004

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Chariton Valley)	_	Sarvice Committee
Telephone Corporation for Modification of the)	Case No	
Federal Communications Commission)		
Requirement to Implement Number Portability)		

MOTION FOR PROTECTIVE ORDER

COMES NOW Chariton Valley Telephone Corporation ("Chariton Valley" or "Petitioner"), 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 Modification 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 ("Staff"), the Office of Public Counsel ("OPC"), and/or Intervenors may seek in discovery may tend to harm the interests of the Petitioner, 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, Chariton Valley respectfully requests

that the Commission issue in this case its standard-form protective containing classifications of "highly confidential" and "proprietary."

Wherefore, Chariton Valley, pursuant to 4 CSR 240-2.085, requests that the Commission issue the Commission's standard form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case, and grant such further relief as the Commission deems appropriate.

Respectfully submitted,

ANDERECK, EVANS, MILNE PEACE & JOHNSON

By:

Craig S. Johnson, MO Bar #28179 Lisa Cole Chase, MO Bar #51502 Col. Darwin Marmaduke House

700 East Capitol P.O. Box 1438

Jefferson City, MO 65102

Telephone: 573/634-3422 Facsimile: 573/634-7822 email: CJohnson@aempb.com email: lisachase@aempb.com

ATTORNEYS FOR PETITIONER

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 <u>JS</u> day of March, 2004, to the following parties:

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

General Counsel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Lisa Cole Chase