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MAR 0 7 2006

Service Commission

March 6, 2006

VIA FEDERAL EXPRESS

Ms. Colleen M. Dale
Interim Secretary / Chief Regulatory Law Judge
MISSOURI PUBLIC SERVICE COMMISSION
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

CA-2006-0323

RE: Application of VCI Company for Certificate of Service Authority to Provide Basic Local Exchange and Exchange Access Service Throughout the State of Missouri and to Classify the Company as Competitive

Dear Ms. Dale:

Please find enclosed for filing with the Commission an original and eight copies of the Motion for Protective Order and to File Financial Statements Under Seal on behalf of VCI Company. This motion refers to Exhibit D of the Application for Certificate of Service Authority to Provide Basic Local Exchange and Exchange Access Service Throughout the State of Missouri and to Classify the Company as Competitive which was filed with the Commission on February 7. I have enclosed a return envelope for your convenience in sending a filed-stamped copy of the motion to me.

Thank you for your consideration in this matter.

Matthew I Faul

MLF/rgr Enclosures

cc: Shelley Syler, MPSC (via email)





BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

MAR 0 7 2006

	Service Commission
In the Matter of the Application of VCI	
Company for Certificate of Service Authority)
to Provide Basic Local Exchange and	Case No. CA-2004-0323
Exchange Access Service throughout the	
State of Missouri and to Classify the	
Company as Competitive	

MOTION FOR PROTECTIVE ORDER AND TO FILE FINANCIAL STATEMENTS UNDER SEAL

Comes now VCI Company ("VCI"), by its undersigned attorneys, and moves that VCI's Financial Statements be filed under seal pursuant to 4 CSR 240-2.085. In support of this Motion, VCI states the following:

- 1. As an addition to its original application, VCI is now filing Exhibit D to its Application for Certificate of Service Authority pursuant to Section 392.361 RSMo and 4 CSR 240-2.060. VCI is filing an Income Statement, a Statement of Cash Flows, and a Balance Sheet for the company as Exhibit D. These attached financial statements disclose confidential information concerning the financial status of VCI.
- 2. VCI maintains that disclosure of this information to the public would be of significant competitive use to competitors while providing no material use to the public.
- 3. None of the information for which this claim of confidentiality is made can be found in any format in any other public document.

Wherefore, VCI respectfully requests that the Commission treat the financial statements filed herewith as containing confidential trade secret information, and allow VCI to file under seal the financial statements included as Exhibit D to its Application for Certificate of Service Authority.

Respectfully Submitted,

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ATTORNEYS FOR APPLICANT VCI COMPANY

VERIFICATION

STATE OF MISSOURI)	
)	SS.
COUNTY OF JACKSON)	

Comes now Matthew L. Faul, being of lawful age and duly sworn, who swears and affirms as follows:

- 1. My name is Matthew L. Faul, and I am an attorney for VCI Company, the Applicant herein. I have been authorized by the Applicant to verify this motion on its behalf.
- 2. I have read the foregoing motion, and its contents are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Matthew L. Faul

Subscribed and sworn to before me this day of March, 2006.

Notary Public

My commission expires:

ERIN E. MILLER
Notary Public - Notary Seal
STATE OF MISSOURI
Jackson County

My Commission Expires: June 29, 2007