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

Complaint of FullTel, Inc., for Enforcement	)	
Of Interconnection Obligations of CenturyTel	)	
of Missouri, LLC	)	
FullTel, Inc.	) ) )	
Complainant	Ĵ	
1	Ś	Case No. TC-2006-0068
	) )	euse 110. 10 2000 0000
V.	)	
	)	
	)	
CenturyTel of Missouri, LLC,	)	
	)	
Respondent	)	

## JOINT MOTION FOR PROTECTIVE ORDER

Come now FullTel, Inc. (FullTel) and CenturyTel of Missouri, LLC (CenturyTel), by their undersigned counsel, and pursuant to 4 CSR 240-2.085, move the Commission to issue a standard-form protective order in this matter. In support of their Joint Motion, FullTel and CenturyTel state as follows:

1. FullTel and CenturyTel have agreed, and the Commission has so ordered, that the hearing in this matter should be canceled and that both parties will be filing a Statement of Facts and legal briefs herein. Under separate cover, FullTel and CenturyTel are filing a Joint Stipulation of Fact in this proceeding this date, and legal briefs will be filed tomorrow by both parties. Certain exhibits that are attached to and made a part of the Joint Stipulation of Fact involve company-specific information that includes competitive technical business information 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 could tend to harm the interests of the party or its employees or customers.

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

WHEREFORE, FullTel, Inc. and CenturyTel of Missouri, LLC, pursuant to 4 CSR 240-2.085, request that the Commission issue its standard protective order in this proceeding, containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case.

Respectfully submitted,

W. Dority

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November 3, 2005

\* Not admitted to practice in the State of Missouri

## **CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov), William K. Haas, Deputy General Counsel (at <u>william.haas@psc.mo.gov</u>), the Office of Public Counsel (at <u>opcservice@ded.mo.gov</u>), and counsel for FullTel, Inc. (at <u>comleym@ncrpc.com</u> & Andrew.Klein@DLAPiper.com), on this 3<sup>rd</sup> day of November 2005.

/s/ Larry W. Dority