## **BEFORE THE PUBLIC SERVICE** ll Missouri Public Service Commission COMMISSION OF THE STATE OF MISSOURI

In the matter of the Application of Ameritel Missouri, Inc. for Certificate of Service Authority to Provide Basic Local Exchange, Interexchange and Local Exchange Telecommunications Services in the State of Missouri and for Competitive Classification

Case No.

FILED

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## **MOTION FOR PROTECTIVE ORDER**

Comes Now Ameritel Missouri, Inc. (Ameritel Missouri 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 Ameritel Missouri's Application for certificate of service authority for basic local telecommunications service, interexchange telecommunications services and nonswitched local exchange service, which is being filed concurrently herewith. In support of its motion, Applicant states as follows:

1. Applicant is a privately held corporation engaged in the provision of telecommunications services which are highly competitive. The public disclosure of financial statements of Applicant could be injurious to its business and competitive positions.

2. Applicant has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. Applicant will late-file Exhibit C to the Application, its highly confidential financial information, after the Commission issues its standard Protective Order in this matter. Only a public version of the Application and attachments is being filed at this time.

3. The financial statements of Applicant are private and confidential financial and business information, and therefore constitute highly confidential information entitled to protection from disclosure under 4 CSR 240-2.085. None of the information for which Applicant claims confidentiality has been released in any format in any other public document.

WHEREFORE, Applicant respectfully requests that the Commission issue its standard protective order in this proceeding with respect to financial statements to be late-filed as Exhibit C to Ameritel Missouri's Application for Certificate of Service Authority and Competitive Classification.

Respectfully submitted,

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## 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 17th day of July 2003.

Mary Ann (Garr) Young