BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)		
Mercury Voice and Data Company)		
for a Certificate of Service)		
Authority to Provide Basic Local, Local and)	Case No. TA 2006	
Interexchange Voice Service in)		
Portions of the State of Missouri and to Classify)		
said Services and the Company as Competitive)		

MOTION FOR PROTECTIVE ORDER

Comes now Mercury Voice and Data Company ("Mercury"), by and through its counsel, and moves the Commission pursuant to 4 CSR § 240-2.085, to issue its standard protective order for use in the above-captioned matter. In support of its motion, Mercury states as follows:

- 1. The Commission has previously recognized the need to protect proprietary and confidential information.
- 2. Mercury is concurrently filing its Application for a certificate of service authority to provide basic local, local and interexchange voice services (the "Application"). Exhibit D to the Application contains financial information of Mercury and its parent company, News-Press & Gazette Company ("NPG"). Exhibit D has been marked "Proprietary Information" and filed under seal with the Commission.
- 3. The information contained in Exhibit D is proprietary financial information of Mercury and NPG. Mercury and NPG would suffer irreparable competitive harm if such information were disclosed to their competitors.
- 4. Mercury anticipates that during the course of this proceeding, Staff and perhaps other parties may inquire into areas of customer-specific information, competitive pricing, or other material of a highly confidential or proprietary nature.
- 5. Mercury anticipates that if testimony is required, some of its testimony and other exhibits in this proceeding may contain information of a highly confidential or proprietary nature.

- 6. Mercury believes that the form of protective order currently utilized by the Missouri Public Service Commission, which contains "Highly Confidential" and "Proprietary" classifications of designated information, is appropriate to utilize in this proceeding.
- 7. Mercury and NPG are privately-held corporations which are not subject to public reporting requirements.
- 8. None of the information for which a claim of confidentiality is made may be found in any format in any other public document.

WHEREFORE, Mercury respectfully requests that the Commission issue its standard protective order in this proceeding.

Respectfully submitted,

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Attorney for Applicant Mercury Voice and

Data Company

Certificate of Service

On this 16th day of June, 2006, a true and correct copy of the above document was served upon each of the parties set forth below via United States Mail, postage prepaid.

Michael L. McCann

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