

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

AUG 23 2000

Missouri Public  
Service Commission

In the matter of the access tariff filing )  
of Ozark Telephone Company. )

Case No. TT-2001- 117

**MOTION FOR ISSUANCE  
OF A PROTECTIVE ORDER**

Comes now Ozark Telephone Company (Company) and moves the Missouri Public Service Commission (Commission) to issue its standard-form protective order in the above-referenced case. In support thereof, the Company respectfully states to the Commission as follows:

1. Simultaneously with the filing of this Motion, the Company is filing a revised access tariff sheet as well as prepared direct testimony and schedules in support thereof. The primary purpose of this tariff filing is to eliminate the "interim, subject to refund" language which currently appears in the Company's intrastate access tariff. Contained in the testimony and schedules supporting the filing is financial information regarding the revenues of the Company which are not otherwise publicly available and constitute proprietary business information. In addition, the Company is filing certain revenue requirement information including, among other things, investment in plant, revenues and expenses which is also not ordinarily made public and constitutes proprietary business information. In addition, the schedules contain certain access minute of use (MOU) data regarding interexchange calling provided by competitive interexchange telecommunication carriers (IXCs). This MOU information can be competitively sensitive information and may constitute highly confidential, market sensitive information as envisioned by the terms of the Commission's standard-form

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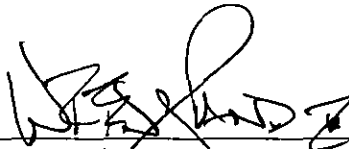
protective order. None of the information contained in the schedules for which a claim of confidentiality is made can be found in any format in any other public document.

2. To the extent the Staff of the Commission (Staff), the Office of the Public Counsel (OPC), or other interested parties seek additional information or data by way of discovery (or otherwise) such additional information or data will likely entail proprietary and/or highly confidential information.

3. Therefore, because of the potential for public disclosure of such confidential information without a protective order in place and the potential harm to Applicant, as well as to others, if this information is made public, the Company moves the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary" information.

WHEREFORE, Company respectfully requests that the Commission 1) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" information in order to guide the parties' conduct in this case and 2) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing document was delivered, via U.S. Mail, and/or hand-delivered this 23<sup>rd</sup> day of August, 2000, to:

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