

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)	
NuVox Communications of Missouri, Inc. for)	Case No. TO-2006-0360
an Investigation into the Wire Centers that)	
AT&T Missouri Asserts are Non-Impaired)	
Under the TRRO.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW NuVox Communications of Missouri, Inc. (“NuVox”) and pursuant to 4 CSR 240-2.085 hereby moves the Commission to issue a standard protective order on the following grounds:

1. NuVox has herewith filed its Application for an Investigation into the Wire Centers that AT&T Missouri Asserts are Non-Impaired Under the TRRO.
2. The Commission has recognized in numerous dockets that there is a genuine need to protect certain confidential information from disclosure. The issuance of protective orders in prior cases has led to the development of a smoother and more orderly discovery procedure, has helped to minimize disputes, and has provided a sound method for submitting confidential information.
3. In this case, it is anticipated certain information which is considered to be proprietary will be involved and this information should not be made public.
4. The Commission should establish its standard protective order.

WHEREFORE, NuVox Communications of Missouri, Inc. respectfully requests the Commission to issue a protective order.

Respectfully submitted,

/s/ Carl J. Lumley

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ATTORNEYS FOR NUVOX COMMUNICATIONS
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was emailed to the parties listed below on this 17th day of March, 2006.

/s/ Carl J. Lumley

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