

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)	
NPG Digital Phone, Inc.)	
for a Certificate of Service)	
Authority to Provide Basic Local, Local and)	Case No. _____
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 NPG Digital Phone, Inc. ("NPG"), 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, NPG states as follows:

1. The Commission has previously recognized the need to protect proprietary and confidential information.
2. NPG 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 NPG and its parent company, News-Press & Gazette Company ("News-Press"). 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 NPG and News-Press. NPG and News-Press would suffer irreparable competitive harm if such information were disclosed to their competitors.
4. NPG 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. NPG 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. NPG 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. NPG and News-Press 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, NPG respectfully requests that the Commission issue its standard protective order in this proceeding.

Respectfully submitted,



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Phone, Inc.*

Certificate of Service

On this 9th day of October, 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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