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June 29, 2000

FILED²

JUN 29 2000

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Case No. TF-2000-428

Dear Mr. Roberts:

Enclosed please find the original plus eight (8) copies of Motion for Issuance of a Protective Order for filing on behalf of Le-Ru Telephone Company in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 
Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
Mr. Denny Frey
Le-Ru Telephone Company

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUN 29 2000

Missouri Public
Service Commission

In the matter of the Application)
of LE-RU TELEPHONE COMPANY)
for authority to borrow an amount)
not to exceed \$9,164,700 from the)
Rural Utilities Service, the Rural)
Telephone Bank and the Federal)
Financing Bank and in connection)
therewith to execute an Amending)
Telephone Loan Contract Amendment,)
Promissory Notes, and a Restated)
Mortgage, Security Agreement and)
Financing Statement.)

Case No. TF-2000-428

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

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

1. On January 18, 2000, Applicant filed an Application with the Commission requesting authority to borrow an amount not to exceed \$9,164,700 from the Rural Utilities Service ("RUS") and the Rural Telephone Bank ("RTB").

2. On June 8, 2000, the Commission issued an Order Directing Filing and Scheduling Hearing in which it requested further information be provided to the Commission by Staff and stated that the parties might file suggestions stating and supporting their positions by June 30. In response to requests by the Commission, both Staff and Le-Ru intend to file financial information with their suggestions which contain projections of the financial and equity

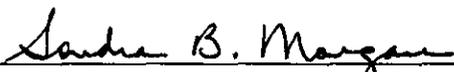
positions of the company over a period of time. Because these projections and the information contained therein relate to the company's business plan over a period of years, Applicant requests that the Commission issue a Protective Order so that this information may be filed as "proprietary." Applicant's projected financial statements and the accompanying information contain sensitive company projections, and public disclosure of this information could cause substantial harm to Applicant. None of the information for which a claim of confidentiality is made can be found in any format in any other public document.

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

WHEREFORE, Applicant respectfully requests that the Commission:

- (a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and,
- (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



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Attorneys for Le-Ru Telephone Company

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 29th day of June, 2000, to:

Office of Public Counsel
Truman State Office Building
301 W. High Street
P.O. Box 7800
Jefferson City, MO 65102

Mr. Denny Frey
Public Service Commission
301 W. High Street
P.O. Box 360
Jefferson City, MO 65102



Sondra B. Morgan