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November 16, 2000

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

Re: FairPoint Communications Solutions Corp
Case No. TA-2000-514

FILED²
NOV 16 2000
Missouri Public
Service Commission

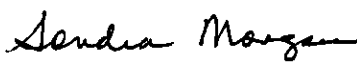
Dear Mr. Roberts:

Enclosed please find the original plus eight (8) copies of Motion for Issuance of a Protective Order for filing on behalf of FairPoint Communications Solutions Corp. 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
Nathan Williams - PSC
Mimi McDonald
FairPoint Communications

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
NOV 16 2000

Missouri Public
Service Commission

In the Matter of the Application of)
FairPoint Communications Solutions Corp.)
for a Certificate of Service Authority)
to Provide Interexchange and Local Exchange)
Telecommunications Services and to Classify)
Said Services and the Company as Competitive)

Case No. TA-2000-514

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now FairPoint Communications Solutions Corp. ("FairPoint" or "Applicant"), f/k/a FairPoint Communications Corp., 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 February 22, 2000, Applicant filed an application with the Commission requesting authority to provide basic local telecommunications service in portions of the State of Missouri.
2. As Appendix C to this Application, Applicant filed financial statements of its parent, MJD Communications. On this date, Applicant is filing a revised Appendix C containing updated financial statements as well as other financial information regarding the Applicant and its parent company portions of which are marked "Proprietary." Applicant requests that this information not be publicly disclosed. Because the information contained therein relates to the company's ability to carry out its business plan, Applicant requests that the Commission issue a Protective Order so that this information may be filed and treated as "proprietary." Public disclosure of this information to potential competitors could cause substantial harm to

13

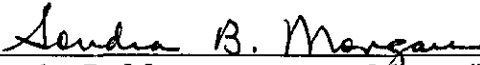
Applicant. None of the information for which a claim of confidentiality is made can be found in any format in any other public document.

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,


Sondra B. Morgan Mo. #35482
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Corp. f/k/a FairPoint Communications Corp.

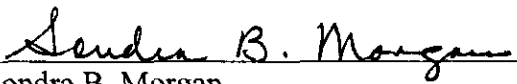
CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was delivered, via U.S. Mail, and/or hand-delivered this 16th day of November, 2000, to:

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200 Madison, Suite 650
P.O. Box 7800
Jefferson City, MO 65102

Nathan Williams
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P.O. Box 360
Jefferson City, MO 65102

Mimi McDonald
Southwestern Bell Telephone Company
One Bell Center, Room 3510
St. Louis, MO 63101


Sondra B. Morgan