

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 21 2000

Missouri Public
Service Commission

IN THE MATTER OF THE APPLICATION)
OF CONNECTSOUTH COMMUNICATIONS)
OF MISSOURI, INC. FOR A CERTIFICATE)
OF SERVICE AUTHORITY TO PROVIDE)
BASIC LOCAL TELECOMMUNICATIONS)
SERVICE, LOCAL EXCHANGE)
TELECOMMUNICATIONS SERVICE, AND)
INTEREXCHANGE)
TELECOMMUNICATIONS SERVICE IN)
THE STATE OF MISSOURI AND TO)
CLASSIFY SAID SERVICES AND THE)
COMPANY AS COMPETITIVE.)

Case No. TA-2000-585

**MOTION OF CONNECTSOUTH COMMUNICATIONS OF MISSOURI, INC.
FOR PROTECTIVE ORDER**

Comes now ConnectSouth Communications of Missouri, Inc. ("ConnectSouth Missouri"), and moves the Commission pursuant to 4 C.S.R. 240-2.080(13), to issue a protective order in this matter with respect to ConnectSouth Missouri's financial information provided in Confidential Exhibit C to its Application for a Certificate of Service Authority and for Competitive Classification. In support of its motion, ConnectSouth Missouri states as follows:

1. In its Application for a Certificate of Service Authority and for Competitive Classification, ConnectSouth Missouri seeks Commission authority to provide basic local telecommunications, local exchange telecommunications, and interexchange telecommunications services on a competitive basis in Missouri. In support of its Application, ConnectSouth Missouri has filed Confidential Exhibit C, which contains competitively sensitive information concerning ConnectSouth Missouri's financial condition.

2. ConnectSouth Missouri requests that its financial statements be treated as proprietary documents, in that release of this information to the public could competitively harm and disadvantage ConnectSouth Missouri.

3. The financial statements are private and confidential financial and business information and, therefore, constitute proprietary information entitled to protection from disclosure under 4 C.S.R. 240-2.080(13).

WHEREFORE, ConnectSouth Communications of Missouri, Inc. respectfully requests that the Commission issue its standard protective order in this proceeding with respect to the financial statements attached to ConnectSouth Missouri's Application as Confidential Exhibit C.

Respectfully submitted,



Mark P. Johnson MO BAR #30740
Lisa C. Creighton MO BAR #42194
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ATTORNEY FOR APPLICANT
CONNECTSOUTH COMMUNICATIONS OF
MISSOURI, INC.

Dated: March 20, 2000

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

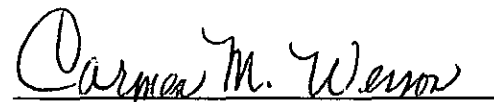
COMES NOW Lisa C. Creighton, being of lawful age and duly sworn, swears and affirms as follows:

1. My name is Lisa C. Creighton, and I am the attorney. for ConnectSouth Communications of Missouri, Inc. In that capacity I am authorized to verify this Motion and the information contained therein on behalf of ConnectSouth Communications of Missouri, Inc.
2. The information contained in the Motion is true and accurate to the best of my knowledge and belief.



Lisa C. Creighton

Subscribed and sworn to before me this 20th day of March, 2000.



Notary Public

My Commission Expires:

**CARMEN M. WESSON
NOTARY PUBLIC STATE OF MISSOURI
CLAY COUNTY
MY COMMISSION EXP. MARCH 23, 2000**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 20th day of March, 2000, two true and correct copies of the above and foregoing was mailed via Federal Express to:

Office of Public Counsel
301 West High Street
Suite 250
Jefferson City, Missouri 65101

With one copy being forwarded via Federal Express on the same date to:

Office of General Counsel
Missouri Public Service Commission
301 West High Street
Room 530
Jefferson City, Missouri 65101



ATTORNEY FOR APPLICANT
CONNECTSOUTH COMMUNICATIONS
OF MISSOURI, INC.