BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

BPS Telephone Company,
Cass County Telephone Company,
Citizens Telephone Company of Higginsville,
Missouri,
Craw-Kan Telephone Cooperative, Inc.,
Fidelity Communication Services I, Inc.,
Fidelity Telephone Company,
Grand River Mutual Telephone Corporation,
Green Hills Telephone Corporation,
Holway Telephone Company,
lamo Telephone Company,
Kingdom Telephone Company,
K.L.M. Telephone Company,
Lathrop Telephone Company, and
Mark Twain Rural Telephone Company,

Complainants,

vs. Case No. TC-2002-

VoiceStream Wireless Corporation, Western Wireless Corporation and Southwestern Bell Telephone Company.

Respondents.

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Come now BPS Telephone Company, Cass County Telephone Company,
Citizens Telephone Company of Higginsville, Missouri, Craw-Kan Telephone
Cooperative, Inc., Fidelity Communication Services I, Inc., Fidelity Telephone
Company, Grand River Mutual Telephone Corporation, Green Hills Telephone
Corporation, Holway Telephone Company, Iamo Telephone Company, Kingdom
Telephone Company, K.L.M. Telephone Company, Lathrop Telephone Company and
Mark Twain Rural Telephone Company (hereinafter collectively Complainants), and for

their Motion for Issuance of a Protective Order in the above-captioned case, state to the Commission as follows:

- 1. On this same date, Complainants are filing a complaint with the Commission against several named wireless carriers and Southwestern Bell Telephone Company. The complaint involves company-specific traffic information which may be deemed by some or all of the Respondents to be highly confidential. Therefore, that information has been withheld from this filing.
- 2. Because the information relates to the wireless carriers' amount of traffic. Complainants request that the Commission issue a Protective Order so that this information may be filed and treated as "highly confidential."

WHEREFORE, Complainants respectfully request that the Commission issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case.

Respectfully submitted,

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Certificate of Service

hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 13th day of May, 2002 to:

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