## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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JUN 2 0 2001

In the matter of the Application of Big River Telephone Company, LLC for certificates of service authority to provide Basic Local, Local Exchange, Exchange Access, and Interexchange Telecommunications Services in the State of Missouri and to classify said services and the company as competitive.

Missouri Public

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Case No. TA - 2001 - 699

## **MOTION FOR PROTECTIVE ORDER**

COMES NOW Big River Telephone Company, LLC ("Big River") and hereby moves the Commission to issue a standard protective order on the following grounds:

1. Big River has herewith filed its Application for Certificates of Service Authority to Provide Basic Local, Local Exchange, Exchange Access, and Interexchange Telecommunications Service and for Competitive Classification.

2. The Commission has recognized in numerous dockets that there is a genuine need to

protect certain confidential information from disclosure. The issuance of protective orders in prior cases has led to the development of a smoother and more orderly discovery procedure, has helped to minimize disputes, and has provided a sound method for submitting confidential information.

3. In this case, certain financial information regarding the company is competitively sensitive and should be protected against public disclosure. None of the information for which a claim of confidentiality is made can be found in any format in any public document.

4. The Commission should establish its standard protective order.

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WHEREFORE, Big River Telephone Company, LLC respectfully requests the Commission to issue a protective order.



Respectfully submitted,

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P.C.

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Certificate of Service

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