

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application)	
of Fidelity Telephone Company)	
for authority to file, establish,)	Case No. IR-2004-0272
and put into effect new, increased,)	
or revised rates and charges for)	
telephone service.)	

Motion for Protective Order

COME NOW Fidelity Telephone Company (Fidelity or Company), by counsel, in accordance with 4 CSR 240-2.085, and, for its motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, states as follows:

1. On December 30, 2003, Fidelity submitted proposed tariff sheets designed to implement a general rate increase for its telephone service. On January 13, 2004, the Commission issued its Suspension Order and Notice establishing hearing dates for the matter.

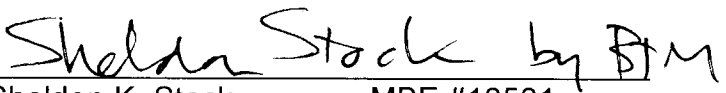
2. The Commission's Staff has issued data requests to Fidelity, and Fidelity's responses to these data requests will include competitive pricing information, employee-specific information, and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in filings or testimony by other parties may contain customer-specific information, competitive pricing information, trade secrets, and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. None of the information can be found in any other public document, and public disclosure of the referenced material which the

Commission's Staff, the Office of Public Counsel, and/or Intervenors may seek in discovery may tend to harm the interests of the Company, its employees, and its customers.

3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, Fidelity respectfully requests that the Commission issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Fidelity, pursuant to 4 CSR 240-2.085, 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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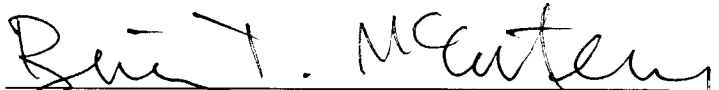
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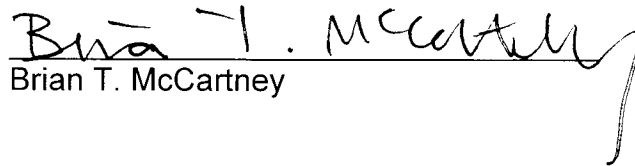
Attorneys for Fidelity Telephone Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 20th day of January, 2004, to the following parties:

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