BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of the Application of M.L.M. Telecommunications Inc. for Certificate of Service Authority to Provide Basic Local Exchange Telecommunications Services within the State of Missouri and for Competitive Classification

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Case No. _____

MOTION FOR PROTECTIVE ORDER

Comes Now M.L.M. Telecommunications Inc. (M.L.M. or Applicant), and moves the Commission, pursuant to 4 CSR 240-2.085, to issue a protective order in this matter with respect to financial information provided in conjunction with M.L.M.'s Application for certificate of service authority for basic local telecommunications service, which is being filed concurrently herewith. In support of its motion, Applicant states as follows:

1. M.L.M. is a privately held corporation engaged in the provision of telecommunications services which are highly competitive. The public disclosure of financial statements of M.L.M. could be injurious to its business and competitive positions.

2. M.L.M. has concurrently filed its Application for certificate of service authority to provide basic local telecommunications service. M.L.M. will late-file Exhibit C to the Application, its highly confidential financial information, after the Commission issues its standard Protective Order in this matter. Only a public version of the Application and attachments is being filed at this time.

3. The financial statements of Applicant are private and confidential financial and business information, and therefore constitute highly confidential information entitled to protection from disclosure under 4 CSR 240-2.085. None of the information for which Applicant claims confidentiality has been released in any format in any other public document.

WHEREFORE, M.L.M. respectfully requests that the Commission issue its standard protective order in this proceeding with respect to financial statements to be late-filed as Exhibit C to M.L.M.'s Application for Certificate of Service Authority.

Respectfully submitted,

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Certificate of Service

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to the Office of Public Counsel and the General Counsel's office on this 14th day of June 2002.