

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

Complaint of

Charter Fiberlink, LLC Seeking Expedited  
Resolution and Enforcement of Interconnection  
Agreement Terms Between Charter Fiberlink-  
Missouri, LLC and CenturyTel of Missouri, LLC

Case No. \_\_\_\_\_

**MOTION FOR PROTECTIVE ORDER**

Pursuant to Missouri Code of State Regulations, 4 C.S.R. 240-2.085 Charter Fiberlink-Missouri, LLC (“Charter”) respectfully requests that the Missouri Public Service Commission (“PSC” or “Commission”) issue a Protective Order regarding information Charter files in its motion for expedited treatment (“Motion”) of certain claims in the complaint filed by Charter (“Complaint”) concurrent with this motion.

The information in the Motion for which Charter seeks protection concerns the number of telephone numbers ported from CenturyTel of Missouri, LLC (“CenturyTel”) to Charter on a weekly and monthly basis. In other words, that information identifies the total number of subscribers (that seek to keep their telephone numbers) that Charter is obtaining from CenturyTel, and that CenturyTel is losing to Charter, in Missouri during the periods of time described in the Motion.

Specific subscriber count information, including the number of subscribers “won”, or “lost,” in any particular circumstance is confidential, competitively sensitive information which

is not normally released to the public, except under certain limited circumstances.<sup>1</sup> It is certainly true that none of this specific information, concerning the number of subscribers ported to, or from, the CenturyTel and Charter network's can be found in any format in any other public document.

Further, Charter does not normally release such information to the public, and consistently uses its best efforts to protect this information from public disclosure. Charter also believes that the significant harm associated with the disclosure of this information would outweigh any public interest in making this information available to Charter's competitors. Therefore, public disclosure of this information would result in substantial harm to Charter and would limit its ability to provide competitive telephone services in Missouri.

WHEREFORE, for the foregoing reasons, Charter respectfully requests that the Commission grant this motion and issue a Protective Order governing the information contained in Charter's Motion for Expedited Treatment.

---

<sup>1</sup> For example, in certain public company securities, or regulatory, filings; or in certain press statements.

Respectfully submitted,

**Charter Fiberlink-Missouri, LLC**

By: 

Laurence G. Christopher MO # 41214

Carrie L. Cox

**CHARTER FIBERLINK-MISSOURI, LLC**

12405 Powerscourt Dr.

St. Louis, Missouri 63131

314-965-0555

314-965-6640 (fax)

K.C. Halm

**DAVIS WRIGHT TREMAINE LLP**

1919 Pennsylvania Ave., N.W., Suite 200

Washington, D.C. 20006

202-973-4287

202-973-4499 (fax)

*Its Attorneys*

Dated: August 23, 2007