

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAR 19 1997
MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of an Investigation)
into the Provision of Community)
Optional Calling Service in)
Missouri.)
Case No. TW-97-333

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now the Small Telephone Company Group, members of which are listed on Attachment "A" ("STCG" or "Applicants"), and move the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Applicants respectfully state to the Commission as follows:

1. On March 7, 1997, the Commission issued its Order Establishing Docket to review Community Optional Service ("COS") as that service is now provided in the State of Missouri in light of local competition and equal access issues. Concurrently with this filing, Applicants are filing their Notice of Participation in this docket.
2. Participants in this proceeding are asked to respond to a list of issues/questions. Applicants anticipate that they will want to submit data requests to other parties in this case requesting information regarding the provision of COS and related matters in order to be able to address the issues and respond to the questions posed by the Commission. These discovery requests may request information which the individual parties will consider to 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. Public disclosure of this material may tend to harm the interests of other participants and their customers.

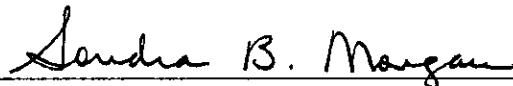
3. In addition, the STCG anticipates that some of the testimony and exhibits filed or offered by parties to this proceeding may make reference to information of a confidential or proprietary nature.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place, the STCG moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, the STCG respectfully 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,



W. R. England, III Mo. #23975
Sondra B. Morgan Mo. #35482
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65101-0456

Attorneys for
The Small Telephone Company Group

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was mailed, United States Mail, postage prepaid, this 19th day of March, 1997, to:

Colleen M. Dale
Deputy General Counsel
Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Craig S. Johnson
Andereck, Evans et al.
301 East McCarty, Box 1438
Jefferson City, Missouri 65102-1438

Paul S. DeFord
Charles W. McKee
Lathrop & Gage
2345 Grand Blvd., Suite 2500
Kansas City, Missouri 64108

Carl J. Lumley
Leland B. Curtis
Curtis, Oetting, et al.
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105

Stephen Morris
MCI Telecommunications Corp.
701 Brazos, Suite 600
Austin, Texas 78701

James C. Stroo
Associate General Counsel
GTE Telephone Operations
1000 GTE Drive, Box 307
Wentzville, Missouri 63385-0307


Paul G. Lane
Diana J. Harter
Leo J. Bub
Southwestern Bell Telephone Company
100 N. Tucker, Room 630
St. Louis, Missouri 63101-1976

Julie E. Grimaldi
Sprint Communications Company
8140 Ward Parkway, 5E
Kansas City, Missouri 64114

Linda K. Gardner
United Telephone Company of Missouri
5454 W. 110th Street
Overland Park, Kansas 66211

Lewis Mills
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Mark W. Comley
Newman, Comley & Ruth
P.O. Box 537
Jefferson City, Missouri 65102


W.R. England III/Sonda B. Morgan

ATTACHMENT A

Alltel Missouri Inc.
Bourbeuse Telephone Company
BPS Telephone Company
Cass County Telephone Company
Citizens Telephone Company of Higginsville, Missouri, Inc.
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Fidelity Telephone Company
Goodman Telephone Company, Inc.
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corp.
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
Le-Ru Telephone Company
McDonald County Telephone Company
Mark Twain Rural Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Co.
Ozark Telephone Company
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company