

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Petition	)	
For Arbitration of Unresolved	)	
Issues Pertaining to a Section 251(b)(5)	)	Case No. _____
Agreement with U.S. Cellular	)	

MOTION FOR PROTECTIVE ORDER

COME NOW BPS Telephone Company, Cass County Telephone Company, Citizens Telephone Company of Higginsville, Missouri, Craw-Kan Telephone Cooperative, Inc., Ellington Telephone Company, Farber Telephone Company, Fidelity Telephone Company, Fidelity Communications Services I, Inc., Fidelity Communications Services II, Inc., Goodman Telephone Company, Granby Telephone Company, Grand River Mutual Telephone Corporation, Green Hills Telephone Corporation, Green Hills Telecommunications Services, Holway Telephone Company, Kingdom Telephone Company, KLM Telephone Company, Lathrop Telephone Company, Le-Ru Telephone Company, Mark Twain Rural Telephone Company, Mark Twain Communications Company, McDonald County Telephone Company, Miller Telephone Company, New Florence Telephone Company, Oregon Farmers Mutual Telephone Company, Ozark Telephone Company, Peace Valley Telephone Company, Inc., Rock Port Telephone Company, Seneca Telephone Company, and Steelville Telephone Exchange, Inc. (the "Petitioners"), pursuant to 4 CSR 240-2.085 and 240-36.040(6), and move the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Petitioners respectfully state to the Commission as follows:

1. The Verified Petition being filed with the Commission on this same date contains information that Petitioners believe to be Proprietary and/or Highly Confidential. Petitioners also anticipate that discovery during the course of this case may include confidential market information, reports, and workpapers, as well as private technical, financial, and business information. This information is unavailable in any other public document. Therefore, because of the need to conduct discovery and the potential harm to Petitioners and/or Respondents if this information is made public, Petitioners move the Commission to issue its standard-form protective order so that such information may be designated as “Proprietary” or “Highly Confidential” during the course of arbitration.

WHEREFORE, Petitioners respectfully request that the Commission issue its standard-form protective order for “highly confidential” or “proprietary” information.

Respectfully submitted,

/s/ Brian T. McCartney

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic transmission, hand-delivered or mail, United States Mail, postage prepaid, this 4th day of October, 2005, to:

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