

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Joint Application of)
)
Acceris Management and Acquisition LLC)
)
and)
) Case No. TA-2007-0067
First Communications, LLC)
)
for (i) Authority for First Communications,)
LLC to Provide Competitive Resold)
Interexchange Telecommunications Services)
Throughout the State of Missouri and)
(ii) Approval of the Transfer of Assets,)
including Customers, of Acceris Management)
and Acquisition LLC to First Communications,)
LLC.)

MOTION FOR PROTECTIVE ORDER

COME NOW First Communications, LLC ("First Communications") and Acceris Management and Acquisition, LLC ("Acceris"), pursuant to 4 CSR 240-2.085 and hereby move the Commission to issue a standard protective order on the following grounds:

1. On August 11, 2006, First Communications and Acceris filed an Application in connection with the above-styled proceeding.
2. The Commission has recognized in numerous dockets that there is a genuine need to protect certain confidential information from disclosure. The issuance of protective orders in prior cases has provided a sound method for submitting confidential information.
3. In this case, certain business information which is considered to be confidential is being provided and this information should not be made public. Public disclosure would harm

the competitive interests of First Communications and Acceris. The confidential information cannot be found in any format in any public document.

4. The Commission should establish its standard protective order.

WHEREFORE, First Communications, LLC and Acceris Management and Acquisition, LLC respectfully request the Commission to issue a protective order.

Respectfully submitted,

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was emailed to the parties listed below on this 11th day of August, 2006.

/s/ Carl J. Lumley

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