

FILED<sup>3</sup>

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

OCT 6 2006

Missouri Public  
Service Commission

In the Matter of the Application of )  
**Network PTS, Inc.** )  
for a Certificate of Service Authority )  
to provide Basic Local Telecommunications )  
Service in portions of the State of Missouri )  
and for Competitive Classification )

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

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Network PTS, Inc. ("Network PTS" or "the Company") and hereby moves the Missouri Public Service Commission, by its undersigned counsel and pursuant to 4 CSR 240-2.085, to issue a Protective Order covering the attached financial information which is submitted under seal in the above captioned matter. Concurrently with this filing, Network PTS has filed an Application with the Commission for a Certificate of Service Authority to Provide Basic Local Exchange Telecommunications Service and for Competitive Classification ("Application").

In connection with that Application, Network PTS is providing (as Appendix C to the Application) confidential financial statements in order to demonstrate that Network PTS has the financial resources necessary to provide basic local telecommunications service in the State of Missouri. In support of this motion, Network PTS states as follows:

1. Network PTS intends to provide telecommunications services that are highly competitive.
2. The financial statements submitted as Appendix C in support of the Company's Application are not generally available to the public. Further, none of the financial information provided in the financial statements can be found in any format in any other public document.
3. Network PTS considers and treats these financial statements as confidential,

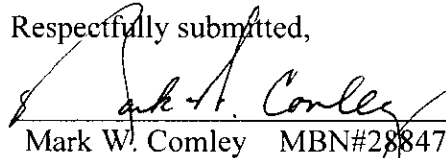
proprietary and non-public commercial information.

4. Disclosure of the financial statements would be extremely detrimental and could be used by Network PTS's competitors to gain a competitive advantage in the marketplace. Moreover, competitors at any level possessing such information would find it of great economic value in devising their own business plans and, in many cases, could use such information to structure their plans in such a way as to undercut or materially affect the Company's competitive positions.

5. Due to the sensitive nature of the information, the potential harm from disclosure of the financial information outweighs the public's interest in disclosure of the information.

WHEREFORE, Network PTS, Inc. respectfully requests that the Missouri Public Service Commission grant it a Protective Order permitting Network PTS to file the attached financial statements under seal.

Respectfully submitted,

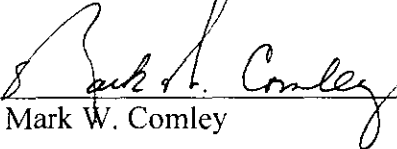


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ATTORNEY FOR APPLICANT  
**Network PTS, Inc.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at opcservice@ded.mo.gov, and on the General Counsel's office at gencounsel@psc.mo.gov this 6th day of October, 2006.

  
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Mark W. Comley