

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

In the Matter of the Request from the )  
Customers in the Rockaway Beach )  
Exchange for an Expanded Calling )  
Scope to Make Toll-Free Calls )  
to Branson. )

**Case No. TO-2003-0257**

**MOTION FOR PROTECTIVE ORDER  
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW CenturyTel of Missouri, LLC ("CenturyTel"), pursuant to 4 CSR 240-2.085 and 4 CSR 240-2.080(16), and respectfully moves the Commission to issue a standard-form protective order in this matter and to do so on an expedited basis, on or before May 24, 2005. In support of its Motion, CenturyTel states as follows:

1. Future filings that have been ordered in this case, as well as possible discovery, will necessarily involve company-specific information that may include competitive costs and pricing information, marketing analyses and strategies, and other technical, financial and business information of a confidential or proprietary nature. Other information that may be requested or utilized in filings or testimony in this case may 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. None of the information can be found in any other public document, and public disclosure of such information could harm the interests of the party from which such material is sought, or its employees or customers.

2. Accordingly, CenturyTel respectfully requests that the Commission issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary.”

3. As CenturyTel has been ordered to “file illustrative tariff sheets and supporting documentation if the company proposes to increase or establish new rates designed to maintain revenue neutrality, including the recovery of any new costs associated with implementing the new proposal . . . no later than May 25, 2005,”<sup>1</sup> CenturyTel requests that the Commission issue its Protective Order on an expedited basis, on or before May 24, 2005. By issuing the Protective Order on an expedited basis, any highly confidential or proprietary information as discussed above that may be filed will be protected and will avoid harm to the company and its customers. There will be no negative effect on CenturyTel’s customers or the general public if the Commission acts by the above-requested date. Undersigned counsel mistakenly believed that a protective order had been issued previously in this matter, and for that reason this motion for expedited treatment is now being filed.

4. CenturyTel is authorized to state that neither the Staff of the Commission nor the Office of the Public Counsel has any objection to the relief requested herein.

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<sup>1</sup> *Order Directing Notice, Setting An Intervention Deadline, Scheduling A Conference, and Regarding the Filing of Illustrative Tariff Sheets*, April 11, 2005, page 4.

WHEREFORE, CenturyTel of Missouri, LLC respectfully requests that the Commission issue its standard protective order in this proceeding, containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case, and that such order be issued on an expedited basis on or before May 24, 2005.

Respectfully submitted,

**/s/ Larry W. Dority**

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Certificate of Service

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)), the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), on this 18<sup>th</sup> day of May 2005.

**/s/ Larry W. Dority**

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Larry W. Dority