

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Revocation of the)	
Eligible Telecommunications Carrier Designation)	File No. RC-2016-0278
of Total Call Mobile, Inc.)	

MOTION FOR PROTECTIVE ORDER

Comes now Total Call Mobile, LLC by and through the undersigned counsel, and pursuant to 4 CSR 240-2.135 hereby moves for a protective order to cover confidential information to be submitted with its Answer pursuant to the Missouri Public Service Commission ("Commission") Order dated April 15, 2016 in the above-captioned matter. The Confidential Information that is the subject of this Motion includes highly confidential company marketing practices, subscriber data and information, and evidence produced to or received from the Federal Communications Commission ("FCC") in its investigation, as well as proprietary business systems, procedures, and training manuals (collectively, the "Confidential Information"). In support, Total Call Mobile, LLC submits the following to the Commission:

1. Public examination or disclosure of the Confidential Information would be extremely detrimental to the business interests of Total Call Mobile, LLC and its shareholders and employees. The Confidential Information includes highly confidential employee-sensitive personnel information, and marketing analysis and other market-specific information relating to services offered in competition with others, see 4 CSR 240-2.135(1)(B)2 & 3, as well as proprietary technical and business information, see 4 CSR 240-2.135(1)(A).

2. Due to the sensitive nature of this information, it is appropriate for the

Commission to limit access to such information. The Confidential Information is being provided for the sole use of the Commission in exercising its governmental functions by examining the Answer and resolving this proceeding. There is no legitimate purpose to be served in disclosing this material to any person other than the appropriate reviewing staff of the Commission and other qualified persons as provided by 4 CSR 240-2.135.

3. The Confidential Information cannot be found in any format in any other public document.

4. Total Call Mobile, LLC requests that it be allowed to designate and protect the Confidential Information consistent with the provisions of 4 CSR 240-2.135 and that the Confidential Information be held confidential indefinitely.

WHEREFORE, Total Call Mobile, LLC respectfully moves that the Commission issue a Protective Order that will authorize it to designate and protect the Confidential Information to be submitted in its Answer herein consistent with the provisions of 4 CSR 240-2.135.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served upon the parties listed below on this 11th day of May, 2016, by either e-mail or U.S. Mail, postage prepaid.

/s/ Carl J. Lumley

Carl J. Lumley

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