

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Joint Application of)	
)	
Acceris Management and Acquisition LLC,)	
New Access Communications LLC)	
)	
and)	
)	Case No. TM-2007-0203
First Communications, LLC)	
)	
for (i) Approval of the Transfer of Assets,)	
including Customers, of Acceris Management)	
and Acquisition LLC and)	
New Access Communications LLC)	
to First Communications, LLC; and)	
(ii) the Voluntary Surrender of the)	
Authorizations of Acceris Management and)	
Acquisition LLC and New Access)	
Communications LLC)	

MOTION FOR PROTECTIVE ORDER

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

1. First, Acceris and New Access have 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, Acceris and New Access. 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, Acceris Management and Acquisition, LLC and New Access Communications 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 30th day of November, 2006.

/s/ Carl J. Lumley

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