

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

In the Matter of the Petition)	
For Arbitration of Unresolved)	
Issues Pertaining to a Section 251(b)(5))	Case No. TO-2006-0463
Agreement with ALLTEL Wireless)	
and Western Wireless)	

MOTION FOR PROTECTIVE ORDER

COME NOW Cass County Telephone Company, Citizens Telephone Company of Higginsville, Missouri, Craw-Kan Telephone Cooperative, Inc., Goodman Telephone Company, Granby Telephone Company, Green Hills Telephone Corporation, Holway Telephone Company, Iamo Telephone Company, Kingdom Telephone Company, KLM Telephone Company, Lathrop Telephone Company, Le-Ru Telephone Company, Mark Twain Rural Telephone Company, McDonald County Telephone Company, Miller Telephone Company, Oregon Farmers Mutual Telephone Company, Ozark Telephone Company, Peace Valley Telephone Company, Inc., Rock Port Telephone Company, and Seneca Telephone Company (the "Petitioners"), pursuant to 4 CSR 240-2.085 and 240-36.040(6), and move the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Petitioners respectfully state to the Commission as follows:

1. Petitioners anticipate that discovery during the course of this case may include confidential market information, reports, and workpapers, as well as private technical, financial, and business information. This information is

unavailable in any other public document. Therefore, because of the need to conduct discovery and the potential harm to Petitioners and/or Respondents if this information is made public, Petitioners move the Commission to issue its standard-form protective order so that such information may be designated as "Proprietary" or "Highly Confidential" during the course of arbitration.

WHEREFORE, Petitioners respectfully request that the Commission issue its standard-form protective order for "highly confidential" or "proprietary" information.

Respectfully submitted,

/s/ Brian T. McCartney

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic transmission, hand-delivered or mail, United States Mail, postage prepaid, this 8th day of June, 2006, to:

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