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FILED²
AUG 13 2002 D.S.

Missouri Public
Service Commission

August 9, 2002

Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

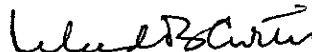
Via Federal Express
833736654684

Re: Case No.: XA-2002-1079

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies of Motion for Protective Order of ICG Telecom Group, Inc. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-address, stamped envelope. If you have any questions, please contact me.

Very truly yours,



Leland B. Curtis

LBC:dn
Enclosures
cc. Parties of Record (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
)
ICG Telecom Group, Inc.)
)
to Expand Its Certificates of Service)
Authority to include provision of Local)
Exchange Telecommunications Service)
Statewide and to Continue to Classify)
the Company and)
Its Services as Competitive.)

Case No. XA-2002-1079

FILED²
AUG 12 2002
Missouri Public
Service Commission

MOTION FOR PROTECTIVE ORDER

COMES NOW ICG Telecom Group, Inc. (ICG) pursuant to Rule 4 CSR 240-2.085 and hereby moves the Commission to issue a standard protective order on the following grounds:


1. ICG has herewith filed its Application to Expand its Certificates of Service Authority to include provision of Local Exchange Telecommunications Service Statewide and to Continue to Classify the Company and its Services as Competitive.

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 led to the development of a smoother and more orderly discovery procedure, has helped to minimize disputes, and has provided a sound method for submitting confidential information.

3. In this case, certain discovery requests will require disclosure of confidential business information and should be protected against public disclosure. None of the information for which a claim of confidentiality is made can be found in any format in any public document.

4. The Commission should establish its standard protective order.

WHEREFORE, ICG Telecom Group, Inc. respectfully requests the Commission to issue a protective order.



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Certificate of Service

A true and correct copy of the foregoing document was mailed this 9th
day of August, 2002, by placing same in the U.S. Mail, postage paid to:

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