

NOV - 9 2005

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

Missouri Public  
Service Commission

Joint Application of )

Claricom Networks, LLC and )  
Matrix Telecom, Inc. )

Docket No. \_\_\_\_\_

for Expedited Approval of the Transfer )  
of Membership Interests and the )  
Merger of Claricom Networks, LLC )  
and Matrix Telecom, Inc. )

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Matrix Telecom, Inc. ("Matrix") and Claricom Networks, LLC ("Claricom") (collectively "Applicants"), by their undersigned counsel and pursuant to 4 CSR 240-2.085, and hereby move for a protective order covering certain confidential information submitted in support of their Application in the captioned matter ("Application"). The Confidential Information that is the subject of this Motion is Attachment C to their Application, which contains the current organizational and post-transaction organizational charts. In support of this Motion, Matrix submits the following:

1. The organizational charts of Applicants submitted in Attachment C to the Application are not available to the public. Furthermore, Applicants consider these documents confidential, proprietary and non-public commercial information.

2. Disclosure of the organizational charts would be extremely detrimental and could be used by Applicants' competitors to gain a competitive advantage in the marketplace. Moreover, competitors at any level possessing such information would find it of great economic value in devising their own business plans and, in many cases, could

use such information to structure their plans in such a way as to undercut or materially affect Applicants' competitive positions.

3. 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 Application. There is no legitimate purpose to be served in disclosing this proprietary material to any person other than the appropriate reviewing staff of the Commission.

4. The organizational charts set forth in Attachment C to the Application are not readily ascertainable by persons external to Applicants, and none of the information for which this claim of confidentiality is made may be found in any format in any other public document.

5. Applicants request that the material contained in Attachment C to their Application be held confidential indefinitely.

WHEREFORE, Matrix Telecom, Inc. and Claricom Networks, LLC respectfully move that the Commission issue a Protective Order that will limit the availability of Attachment C to the above-referenced Application to the reviewing staff of the Commission.

Respectfully Submitted,

MATRIX TELECOM, INC.



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### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 9th day of November, 2005, to General Counsel's Office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov); and Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov).

