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March 16, 2004

FILED²

MAR 16 2004

Missouri Public
Service Commission

Secretary

Public Service Commission

P.O. Box 360

Jefferson City, Missouri 65102

Re: Motion for Protective Order In the Matter of Chariton Valley Telecom
Corporation for Modification of the Federal Communications Commission
Requirement to Implement Number Portability

Dear Secretary:

Enclosed please find an original and eight copies of the Motion for Protective Order In
the Matter of Chariton Valley Telecom Corporation for Modification of the Federal
Communications Commission Requirement to Implement Number Portability.

Thank you for seeing this filed.

Sincerely,

Lisa Chase
Lisa C. Chase

LCC:lw

Encl.

CC: Public Service Commission
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FILED²
MAR 16 2004

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Chariton Valley)
Telecom Corporation for Modification of the)
Federal Communications Commission)
Requirement to Implement Number Portability)

Case No. _____

Missouri Public
Service Commission

MOTION FOR PROTECTIVE ORDER

COMES NOW Chariton Valley Telecom Corporation ("CVTC" or "Petitioner"), by counsel, in accordance with 4 CSR 240-2.085, and, for its motion for issuance of the Missouri Public Service Commission's ("Commission") standard form protective order, states as follows:

1. Concurrently with this motion, Petitioner has filed a Petition for Modification of the Federal Communications Commission ("FCC") requirements for wireline-to-wireless Local Number Portability ("LNP").

2. Petitioner plans to file company-specific information to support this Petition that may include competitive pricing information, employee-specific information, and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in filings or testimony by other parties may contain customer-specific information, competitive pricing information, trade secrets, and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. None of the information can be found in any other public document, and public disclosure of the referenced material which the Commission's Staff ("Staff"), the Office of Public Counsel ("OPC"), and/or Intervenors may seek in discovery may tend to harm the interests of the Petitioner, its employees, and its customers.

3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, CVTC respectfully requests that the

Commission issue in this case its standard-form protective containing classifications of "highly confidential" and "proprietary."

Wherefore, CVTC, pursuant to 4 CSR 240-2.085, requests that the Commission issue the Commission's standard form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case, and grant such further relief as the Commission deems appropriate.

Respectfully submitted,

**ANDERECK, EVANS, MILNE
PEACE & JOHNSON**

By:


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ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 15 day of March, 2004, to the following parties:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

General Counsel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102



Lisa Cole Chase