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ILLINOIS COMMERCE COMMISSION

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Illinois Bell Telephone Company )  
 )  
 Annual Rate Filing for Noncompetitive Services )  
 Under an Alternative Form of Regulation )

Docket No. 04-0312

**MOTION FOR PROTECTIVE ORDER**

Illinois Bell Telephone Company ("SBC Illinois" or the "Company"), by its attorney, hereby requests that the Commission enter an order treating certain information contained in SBC Illinois' Annual Rate Filing as proprietary. In support whereof, SBC Illinois states as follows:

1. Under the terms of the Commission's Alternative Regulation Plan ("Plan") orders in Docket Nos. 92-0448/93-0239 and 98-0252/98-0335/00-0764, SBC Illinois is required to make an annual rate filing to implement the terms of the Plan. SBC Illinois is further required to submit certain schedules in support of its filing.

2. The Company has this day filed with the Commission its 2003 Annual Rate Filing consisting of nine (9) schedules, as required by the Plan.

3. Two of the required schedules (Exhibit 5 (Service Baskets) and Exhibit 6 (Compliance with Section 13-507)) contain proprietary information. Exhibit 5 contains highly detailed information on the quantities in service of all of the products and services covered by the Plan. Exhibit 6 contains detailed service cost information for both competitive and noncompetitive products and services. The information contained in these two schedules would be valuable to SBC Illinois' competitors in determining how to develop, price and market their services and, therefore, should be accorded proprietary treatment.

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4. Proprietary treatment of Exhibits 5 and 6 is consistent with the Commission's treatment of the same information submitted in previous Annual Rate Filings.

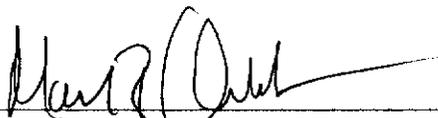
5. SBC Illinois requests that this information be maintained as proprietary for a period of five years.

6. If parties to this proceeding require a copy of either proprietary exhibit in order to participate in this proceeding, SBC Illinois will make them available pursuant to the terms and conditions contained in any Protective Order issued by the Commission and pursuant to the terms and conditions contained the Proprietary Agreement attached hereto as Schedule 1.

WHEREFORE, in view of the foregoing, SBC Illinois requests that the Commission enter an Order allowing the confidential and proprietary treatment of Exhibits 5 and 6 to the 2003 Annual Rate Filing for a period of five (5) years, and that the Commission further order that the Proprietary Agreement attached hereto as Schedule 1 govern the disclosure of any confidential or proprietary information to any parties that require such information to participate in this proceeding.

Respectfully submitted,

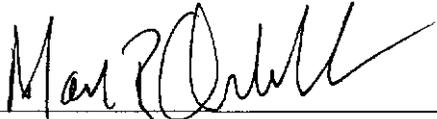
ILLINOIS BELL TELEPHONE COMPANY

  
\_\_\_\_\_  
One of Its Attorneys

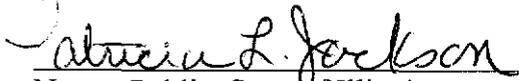
Mark R. Ortlieb  
Illinois Bell Telephone Company  
225 West Randolph, Suite 2500  
Chicago, Illinois 60606  
(312) 727-2415

**VERIFICATION**

I, Mark R. Ortlieb, on oath, state that I am one of the attorneys for SBC Illinois, that I have reviewed the foregoing **MOTION FOR PROTECTIVE ORDER**, and that, to the best of my knowledge, information and belief, the statements contained therein are true and correct.

  
\_\_\_\_\_  
Mark R. Ortlieb

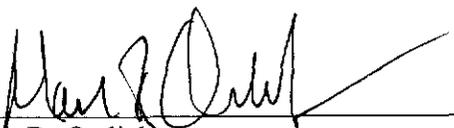
Subscribed and sworn to before  
me this 1st day of April, 2004

  
\_\_\_\_\_  
Notary Public, State of Illinois



**CERTIFICATE OF SERVICE**

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **MOTION FOR PROTECTIVE ORDER** was served on the following parties by electronic transmission on April 1, 2004.

  
\_\_\_\_\_  
Mark R. Ortlieb