

# McDowell & Rackner PC



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April 9, 2007

## VIA ELECTRONIC FILING

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: Docket No. UM 1307**

Enclosed for filing is Wantel, Inc.'s Motion for Standard Protective Order in the above-referenced proceeding.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa F. Rackner", with a long, sweeping flourish extending to the right.

Lisa F. Rackner

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1307

In the Matter of WANTEL, INC., d/b/a  
ComspanUSA Application for Designation  
as an Eligible Telecommunications Carrier  
in the Coquille Wire Center Pursuant to the  
Telecommunications Act of 1996 – Non-  
Rural Areas.

**MOTION FOR STANDARD  
PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), Wantel, Inc. d/b/a ComspanUSA ("Wantel")  
moves for entry of the Commission's standard protective order in this proceeding. As good  
cause for this motion, Wantel states:

1. The Commission's rules authorize Wantel to seek reasonable restrictions on  
discovery of trade secrets and other confidential business information. See OAR 860-11-  
0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7) (providing  
protection against unrestricted discovery of "trade secrets or other confidential research,  
development, or commercial information"). See also *In re Investigation into the Cost of  
Providing Telecommunication Service* (UM 351), Order No. 91-500 (1991) (recognizing that  
protective orders are a reasonable means to protect "the rights of a party to trade secrets  
and other confidential commercial information" and "to facilitate the communication of  
information between litigants").

2. Wantel wishes to file its five-year business plan in support of its application in  
this docket. However, that plan contains proprietary cost data and market penetration  
projections. Wantel will be exposed to competitive injury if it is forced to make unrestricted  
disclosure of its confidential business information.

3. Issuance of a protective order will facilitate the production of relevant  
information, aid the discovery process and expedite resolution of this case.

1 For the foregoing reasons, Wantel requests entry of the Commission's standard  
2 protective order in this docket.

3 DATED: April 9, 2007.

4 MCDOWELL & RACKNER PC

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6 Lisa F. Rackner

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8 Of Attorneys for Wantel, Inc.

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