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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM _____

In the Matter of WANTEL, INC., d/b/a
ComspanUSA Application for Designation
as an Eligible Telecommunications Carrier
in the Myrtle Point 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 27, 2007.

4 MCDOWELL & RACKNER PC

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7 Lisa F. Rackner

8 Of Attorneys for Wantel, Inc. d/b/a
9 ComspanUSA
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