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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM \_\_\_\_\_

Application of Wantel, Inc. d/b/a  
ComspanUSA for Designation as an Eligible  
Telecommunications Carrier in the  
Oakridge, Veneta, Reedsport and Myrtle  
Point Wire Centers 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: May 15, 2007.

4 MCDOWELL & RACKNER PC

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6 Lisa F. Rackner

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

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