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Carla M. Butler
Lead Paralegal

July 24, 2007

Frances Nichols Anglin
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: IC 13

Dear Ms. Nichols Anglin:

Enclosed for filing in the above entitled matter please find an original and (5) copies of Qwest Corporation's Motion for Adoption of the Commission's Standard Protective Order, along with a certificate of service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:

Enclosure

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IC 13

UNIVERSAL TELECOMMUNICATIONS, INC.,

Plaintiff,

v.

QWEST CORPORATION,

Defendant.

**QWEST CORPORATION'S MOTION
FOR ADOPTION OF THE
COMMISSION'S STANDARD
PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), defendant Qwest Corporation (“Qwest”) hereby respectfully requests entry of the Commission’s standard protective order for this proceeding in order to limit disclosure of confidential information. Thus, Qwest requests that the Public Utility Commission of Oregon (“the Commission”) issue its standard protective order.

ORCP 36 C(7) provides for the issuance of a protective order that “a trade secret or other confidential research, development, or commercial information not be disclosed or be disclosed only in a designated way.” Good cause exists for the issuance of a protective order for this docket. This docket is the result of an interconnection enforcement complaint by plaintiff Universal Telecom, Inc. (“Universal”) pertaining to certain disputes purportedly under the interconnection agreement the Commission approved in Order No. 06484 in docket ARB 671.

Because of the nature of the billing disputes at issue, and the expedited nature of the relief that Universal seeks, there is a need to file confidential information in this docket. Accordingly, now that Universal has raised these issues, and that Qwest must defend itself, which may involve confidential information, Qwest hereby requests the immediate issuance of the Commission’s standard protective order.

Finally, unprotected disclosure of this information could benefit Qwest’s or Universal’s competitors. Such information could be used by Qwest’s or by Universal’s competitors to their

commercial advantage, and to Qwest's and/or Universal's commercial disadvantage, resulting in monetary loss to Qwest and/or Universal, ultimately, their respective customers. The information at issue is proprietary, cannot be easily duplicated or acquired by others, and is valuable. Finally, Qwest has taken stringent measures to safeguard the confidentiality of the information.

Accordingly, the Commission should enter its standard protective order to limit the use and disclosure of such confidential information, and should do so as soon as possible.

WHEREFORE, Qwest respectfully requests the issuance of the Commission's standard protective order.

DATED: July 24, 2007

QWEST CORPORATION



By _____
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Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

IC 13

I hereby certify that on the 24th day of July, 2007, I served the foregoing QWEST CORPORATION'S MOTION FOR ADOPTION OF THE COMMISSION'S STANDARD PROTECTIVE ORDER in the above-entitled docket on the following persons via U.S. Mail and electronic mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon, as well as submitting to the counsel listed below a courtesy electronic copy of same:

Mark Trincherro
Davis Wright Tremaine LLP
1300 S.W. Fifth Ave., Suite 2300
Portland, OR 97201
marktrincherro@dwt.com

Jeffry Martin
Universal Telecom, Inc.
1600 SW Western Blvd., Suite 290
Corvallis, OR 97333
martinj@uspops.com

DATED this 24th day of July, 2007

QWEST CORPORATION



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Attorney for Qwest Corporation