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Carla M. Butler
Lead Paralegal

September 21, 2009

Carol Hulse
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM-1451

Dear Ms. Hulse:

Enclosed for filing please find an original and (5) copies of Malheur Home Telephone Company's and Qwest Corporation's Joint Motion For Entry 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

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1451

In the Matter of the Application of Malheur Home Telephone Company for an Order Approving Transaction, and Request for Expedited Consideration

MALHEUR HOME TELEPHONE COMPANY'S AND QWEST CORPORATION'S JOINT MOTION FOR ENTRY OF THE COMMISSION'S STANDARD PROTECTIVE ORDER

Pursuant to OAR 860-012-0035(1)(k), applicant Malheur Home Telephone Company (“Malheur”) and its corporate parent company, intervenor Qwest Corporation (“Qwest”), hereby jointly respectfully request entry of a protective order in this docket to limit disclosure of confidential information. Malheur and Qwest request that the Public Utility Commission of Oregon (the “Commission”) issue the standard protective order adopted by the Commission.

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. This proceeding will involve issues that may require Malheur and Qwest to disclose sensitive, proprietary, and confidential information, including confidential financial information regarding their reasons for consolidating Qwest’s wholly-owned subsidiary, Malheur, into its corporate parent, Qwest, as requested in Malheur’s application. Thus, the Commission should enter its standard protective order to limit the use and disclosure of any confidential information.

Unprotected disclosure of this confidential and proprietary information could benefit Malheur’s and Qwest’s competitors and others. Such information could be used by Malheur’s

and Qwest's competitors to their commercial advantage, and to Malheur's and Qwest's commercial disadvantage, resulting in monetary loss to Malheur and Qwest and, ultimately, their customers. The information is proprietary, cannot be easily duplicated or acquired by others, and is valuable. Malheur and Qwest have taken stringent measures to safeguard the confidentiality of the information.

WHEREFORE, Malheur and Qwest respectfully request the issuance of a standard protective order.

DATED this 21st day of September, 2009

Respectfully submitted,

QWEST CORPORATION



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Attorneys for Malheur Home Telephone
Company and Qwest Corporation

CERTIFICATE OF SERVICE

UM 1451

I hereby certify that on the 21st day of September 2009, I served the foregoing **MALHEUR HOME TELEPHONE COMPANY'S AND QWEST CORPORATION'S JOINT MOTION FOR ENTRY OF THE COMMISSION'S STANDARD PROTECTIVE ORDER** in the above entitled docket on the following persons via U.S. 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.

Michael T. Weirich, Esq.
Department of Justice
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Salem, OR 97301

Larry Reichman
Perkins Coie, LLP
1120 N.W. Couch St.
10th Floor
Portland, OR 97209-4128

Mark Reynolds
Qwest Corporation
1600 7th Ave., Room 3206
Seattle, WA 98191

David Gabica
Malheur Home Telephone Co.
P.O. Box 249
Ontario, Oregon 97914

Kay Marinos
Oregon Public Utility Commission
P.O. Box 2148
Salem, OR 97308

DATED this 21st day of September, 2009.

QWEST CORPORATION



By: _____

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