

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1901**

4 In the Matter of

5 Q LINK WIRELESS LLC

6 Application for Designation as an Eligible  
7 Telecommunications Carrier and Eligible  
8 Telecommunications Provider, and Request for  
Certain Waivers.

MOTION FOR STANDARD  
PROTECTIVE ORDER

9 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Q LINK WIRELESS LLC (“Q  
10 LINK” or the “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
11 (“Commission”) general protective order in this proceeding. Good cause exists to issue a  
12 protective order to protect commercially sensitive and confidential business information related  
13 to the Company’s Application for Designation as an Eligible Telecommunications Carrier and  
14 Eligible Telecommunications Provider, and Request for Certain Waivers.

15 In support of this Motion, the Company states:

16 1. The Commission’s rules authorize Q LINK to seek reasonable restrictions on  
17 discovery of trade secrets and other confidential business information. *See* 860-001-0080;  
18 ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other  
19 confidential research, development, or commercial information”). *See also In re Investigation*  
20 *into the Cost of Providing Telecommunication Service*, Docket No. UM 351, Order No. 91-500  
21 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a party  
22 to trade secrets and other confidential commercial information” and “to facilitate the  
23 communication of information between litigants”).

24 2. On October 4, 2017, Q LINK filed its Application for Designation as an Eligible  
25 Telecommunications Carrier and Eligible Telecommunications Provider, and Request for Certain  
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1 Waivers, with supporting exhibits. Certain of the exhibits include confidential and proprietary  
2 business and financial information regarding ongoing business negotiations and Q LINK's  
3 proprietary procedures and scoring of offers received in the negotiations. If this confidential and  
4 proprietary business information were to become public, Q LINK and others will be exposed to  
5 competitive injury. "The Commission's standard blanket protective order is designed to facilitate  
6 discovery in cases involving discovery of large numbers of documents." *See In re Portland*  
7 *Extended Area Service Region*, Docket No. UM 261, Order No. 91-958 (1991). Issuance of a  
8 protective order will facilitate the production of relevant information and expedite the discovery  
9 process.

10 For the foregoing reasons, Q LINK requests entry of a standard protective order in this  
11 docket.

12 DATED: October 4, 2017.

**MCDOWELL RACKNER GIBSON PC**



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