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September 10, 2014

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: UM 259 – Teleconnect Long Distance Services and Systems Company and
CP-734 – MCI Communications Services, Inc.**

Attention Filing Center:

Enclosed for filing in the above-referenced dockets is an original and one copy of the Motion for Protective Order.

A copy of this filing has been served on all parties to this proceeding as indicated on the enclosed certificate of service.

Very truly yours,

Wendy McIndoo
Office Manager

cc: Service List

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

3 **UM 259, CP 734**

4 In the Matter of

5 **TELECONNECT LONG DISTANCE**
6 **SERVICES AND SYSTEMS COMPANY**

7 Application For Certificate Of Authority To
8 Provide Telecommunications Service In
9 Oregon And Classification As A Competitive
10 Telecommunications Provider

11 and

12 In the Matter of

13 **MCI WORLDCOM COMMUNICATIONS, INC.**

14 Application for a Certificate of Authority to
15 Provide Telecommunications Service in
16 Oregon and Classification as a Competitive
17 Telecommunications Provider

MOTION FOR PROTECTIVE ORDER

18 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Teleconnect Long Distance
19 Services and Systems Company ("Teleconnect") and MCI Communications Services, Inc.
20 d/b/a Verizon Business Services ("MCI") (together "Applicants") move for the entry of the
21 Public Utility Commission of Oregon's ("Commission") general protective order in this
22 proceeding. Good cause exists to issue a Protective Order to protect commercially sensitive
23 and confidential business information related to the Applicants' operations in Oregon.

24 In support of this Motion, the Applicants state:

25 1. The Commission's rules authorize Applicants to seek reasonable restrictions on
26 discovery of trade secrets and other confidential business information. See 860-001-0080;
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*, Docket UM 351, Order No. 91-500
(1991) (recognizing that protective orders are a reasonable means to protect "the rights of a

1 party to trade secrets and other confidential commercial information” and “to facilitate the
2 communication of information between litigants”).

3 2. On September 10, 2014, Applicants filed a redacted version of Notice of
4 Customer Transfer and Request for Waiver pursuant to OAR 860-032-0020. Under that rule,
5 Applicants are required to state the number of customers affected, which information
6 Applicants consider to be confidential. Applicants will be exposed to competitive injury if they
7 are forced to make unrestricted disclosure of its confidential business information. “The
8 Commission's standard blanket protective order is designed to facilitate discovery in cases
9 involving discovery of large numbers of documents.” See *In re Portland Extended Area*
10 *Service Region*, Docket UM 261, Order No. 91-958 (1991). Issuance of a protective order will
11 facilitate the production of relevant information and expedite the discovery process.

12 For the foregoing reasons, Applicants request entry of a standard Protective Order in
13 this docket. Once that Protective Order is adopted, Applicants will file an unredacted version
14 of their Notice of Customer Transfer and Request for Waiver.

15 DATED: September 10, 2014.

McDOWELL RACKNER & GIBSON PC



16
17
18 Lisa F. Rackner

19 Attorneys for
20 Teleconnect Long Distance Services and
Systems Company and
MCI Communications Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Dockets UM 259 and CP-734 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

UM-259

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CP-734

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Dated: September 10, 2014


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