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Carla M. Butler
Lead Paralegal

February 8, 2008

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

Re: UM 1354

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 Protective Order, along with a certificate of service.

If you have any questions, please do not hesitate to give me a call.

Sincerely,

A handwritten signature in blue ink that reads "Carla".

Carla M. Butler

CMB:

Enclosure

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1354

In the Matter of the Petition of QWEST CORPORATION for Approval of a Price Plan Pursuant to ORS 759.255

MOTION FOR ADOPTION OF PROTECTIVE ORDER BY QWEST CORPORATION

Pursuant to OAR 860-012-0035(1)(k), Qwest Corporation (“Qwest”) hereby respectfully requests entry of a protective order in this docket to limit disclosure of confidential information. Qwest requests 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 pertains to Qwest’s petition for approval of a price plan pursuant to ORS 759.255. this proceeding will involve issues that may require Qwest to disclose sensitive, proprietary, and confidential information, such as information about Qwest’s access lines and regarding competition for access lines in the state of Oregon. Indeed, Qwest will be filing its direct testimony on Monday, February 11, 2008, and there will be confidential information that will be filed at that time. Qwest also expects that Commission Staff and the various intervenors will submit data requests that will require the disclosure of confidential and proprietary information. Thus, the Commission should enter its standard protective order to limit the use and disclosure of such confidential information.

Unprotected disclosure of this information could benefit Qwest's competitors. Such information could be used by Qwest's competitors (some of whom are also its wholesale customers) to their commercial advantage and to Qwest's commercial disadvantage, resulting in monetary loss to Qwest and, ultimately, its customers. The information is proprietary, cannot be easily duplicated or acquired by others, and is valuable. Qwest has taken stringent measures to safeguard the confidentiality of the information.

WHEREFORE, Qwest respectfully requests the issuance of a standard protective order.

DATED: February 8, 2008

QWEST CORPORATION



By _____
Alex M. Duarte, OSB No. 02045
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Alex.Duarte@qwest.com

Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

UM 1354

I hereby certify that on the 8th day of February 2008, I served the foregoing **QWEST CORPORATION'S MOTION FOR ADOPTION OF 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.

Jason Eisdorfer
Robert Jenks
Lowrey Brown
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205
** paper service waived*

Lawrence Reichman
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James E. Green
Verizon Northwest Inc.
Suite 150
20575 NW Von Neumann Dr.
Beaverton, OR 97006

DATED this 8th day of February, 2008.

QWEST CORPORATION



By: _____

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