

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

3   **UM 1437**

4 In the Matter of  
5 TRACFONE WIRELESS, INC.  
6 Application for Designation as an Eligible  
7 Telecommunications Carrier.

MOTION FOR ENTRY OF STANDARD  
PROTECTIVE ORDER

8           Pursuant to OAR 860-012-0035(1)(k), applicant TracFone Wireless, Inc. ("TracFone")  
9 respectfully requests entry of the Commission's standard protective order in this proceeding.

10 TracFone believes good cause exists for issuance of such an order to protect confidential  
11 business information. In support of this motion, TracFone states the following:

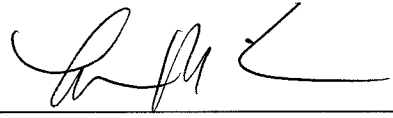
12           1.       The Commission's rules authorize a party to seek reasonable restrictions on  
13 discovery of trade secrets and other confidential business information. *See* OAR 860-11-000(3)  
14 (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7) (providing protection  
15 against unrestricted discovery of "a trade secret or other confidential research, development, or  
16 commercial information"). *See also In re Investigation into the Cost of Providing*  
17 *Telecommunications Service* (Docket UM 351), Order No. 91-500 (1991) (recognizing that  
18 protective orders are a reasonable means to protect "the rights of a party to trade secrets and  
19 other confidential commercial information" and "to facilitate the communication of information  
20 between litigants").

21           2.       Good cause exists for the issuance of a protective order in this proceeding.  
22 TracFone anticipates that discovery in this proceeding will include commercially sensitive  
23 information. TracFone will be exposed to competitive injury if it is forced to make unrestricted  
24 disclosure of its confidential business information. Issuance of a protective order will facilitate  
25 the production of relevant information.

1           3.       Accordingly, TracFone seeks the issuance of the Commission's standard  
2 protective order to limit the use and disclosure of confidential business information.

3 DATED: May 19, 2010

**PERKINS COIE LLP**

4  
5 By:   
6       Lawrence H. Reichman, OSB No. 860836

7       Attorneys for TracFone Wireless, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 19th day of May, 2010, served the foregoing **MOTION FOR ENTRY OF STANDARD PROTECTIVE ORDER** upon all parties of record in this proceeding by causing a copy to be sent by electronic mail and U.S. mail to the following addresses (as indicated below):

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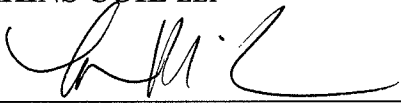
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