

# McDowell Rackner & Gibson PC



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September 9, 2014

## VIA ELECTRONIC AND U.S. MAIL

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

**Re: CP-144 – Verizon Long Distance LLC and  
CP-202 – Verizon Enterprise Solutions LLC**

Attention Filing Center:

On behalf of Verizon Long Distance LLC and Verizon Enterprise Solutions LLC, 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,

A handwritten signature in blue ink that reads "Wendy McIndoo". The signature is written in a cursive, flowing style.

Wendy McIndoo  
Office Manager

cc: Service List

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

3   **CP-144, CP-202**

4                    (VERIZON LONG DISTANCE LLC)

5                    In the Matter of

6                    BELL ATLANTIC COMMUNICATIONS INC

7                    Application for a Certificate of Authority to  
8                    Provide Telecommunications Services in  
9                    Oregon and Classification as a Competitive  
10                   Telecommunications Provider  
11                   (Verizon Long Distance LLC)

12   and

13                   (VERIZON ENTERPRISE SOLUTIONS LLC)

14                   In the Matter of

15                   NYNEX LONG DISTANCE CO

16                   Application For A Certificate Of Authority To  
17                   Provide Telecommunication Services In  
18                   Oregon And Classification As A Competitive  
19                   Telecommunications Provider

MOTION FOR PROTECTIVE ORDER

20                   Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Verizon Long Distance LLC and  
21                   Verizon Enterprise Solutions LLC (together, "Verizon") move for the entry of the Public Utility  
22                   Commission of Oregon's ("Commission") general protective order in this proceeding. Good  
23                   cause exists to issue a Protective Order to protect commercially sensitive and confidential  
24                   business information related to the Company's operations in Oregon.

25                   In support of this Motion, the Company states:

26                   1.    The Commission's rules authorize Verizon to seek reasonable restrictions on  
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

1 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a  
2 party to trade secrets and other confidential commercial information” and “to facilitate the  
3 communication of information between litigants”).

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

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

16 DATED: September 9, 2014.

17 McDOWELL RACKNER & GIBSON PC

18 

19 Lisa F. Rackner

20 Attorneys for Verizon

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Dockets CP-144 and CP-202 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.

### CP-144

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### CP-202

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Dated: September 9, 2013

  
Wendy McIndoo  
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