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4 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

5 **ARB 747**

6
7 In the Matter of BEAVER CREEK
8 COOPERATIVE TELEPHONE COMPANY'S
9 Petition for Arbitration of the Terms, Conditions
10 and Prices for Interconnection and Related
11 Arrangements with QWEST CORPORATION

12 QWEST'S MOTION FOR ENTRY OF
13 STANDARD PROTECTIVE ORDER

14 Pursuant to OAR 860-012-0035(1)(k), Qwest Corporation ("Qwest") respectfully
15 requests entry of a protective order in this docket to limit disclosure of confidential information.
16 Specifically, Qwest requests that the Commission issue its standard protective order.

17 ORCP 36 C(7) provides for the issuance of a protective order that "a trade secret or other
18 confidential research, development, or commercial information not be disclosed or be disclosed
19 only in a designated way." Good cause exists for the issuance of a protective order. Some of the
20 issues in this proceeding relate to the routing, rating, and volume of traffic between Qwest and
21 Beaver Creek as well as traffic originated by and terminated to other carriers. These issues may
22 require Qwest to disclose sensitive, proprietary, and confidential information in discovery as well
23 as in testimony.

24 Unprotected disclosure of this information could benefit Qwest's competitors. Such
25 information could be used by Qwest's competitors and wholesale customers to their commercial
26 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

1 by others, and is valuable. Qwest has taken stringent measures to safeguard the confidentiality
2 of the information.

3 Accordingly, Qwest seeks the issuance of the Commission's standard protective order to
4 limit the use and disclosure of such confidential information.

5 DATED: July 28, 2006.

6 **PERKINS COIE LLP**

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8 By  _____

Lawrence H. Reichman, OSB No. 86083

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1 **CERTIFICATE OF SERVICE**


2 I certify that I have this day served the QWEST'S MOTION FOR ENTRY OF
3 STANDARD PROTECTIVE ORDER by causing a copy to be sent via electronic mail and U.S.
4 mail to:

5 Richard A. Finnigan
6 Law Office of Richard A.
7 Finnigan
8 2112 Black Lake Blvd. SW
9 Olympia, WA 98512

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DATED: July 28, 2006.

10 **PERKINS COIE**

11 
12 By _____
13 Lawrence H. Reichman, OSB No. 86083

14 Attorneys for Qwest Corporation