

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM 1190**

4 In the Matter of WANTEL, INC. d/b/a
5 COMSPANUSA's Application for Oregon Universal
6 Service Support Eligibility and Dialing Parity Plan

**WANTEL, INC.'S MOTION FOR
PROTECTIVE ORDER**

7 Pursuant to OAR 860-012-0035(1)(k), Wantel, Inc. d/b/a ComspanUSA ("Wantel")
8 hereby respectfully requests entry of a protective order in this proceeding to limit disclosure of
9 confidential information. Wantel requests that the Public Utility Commission of Oregon (the
10 "Commission") issue the standard protective order adopted by the Commission.

11 Wantel seeks designation as an Eligible Telecommunications Carrier ("ETC"). Wantel
12 has submitted strategic plans that include the 5 year plan and projections required for the
13 application for designation in support of its application, as well as maps and other internal
14 planning documents. Wantel will be exposed to competitive injury if it is forced to make
15 unrestricted disclosure of this confidential business information. In addition, there may be other
16 confidential information submitted to support its application for ETC designation.

17 OAR 860-011-000(3) provides that the Oregon Rules of Civil Procedure ("ORCP")
18 govern these proceedings. ORCP 36C(7) provides for the issuance of a protective order that
19 ensures "a trade secret or other confidential research, development, or commercial information
20 not be disclosed or be disclosed only in a designated way." Wantel requests the entry of the
21 standard protective order to protect such information by limiting disclosure to specified persons,
22 and requiring those persons to use the information only for purposes of this proceeding.

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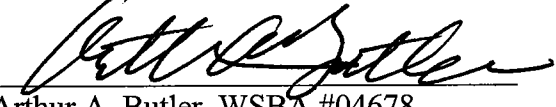
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1 WHEREFORE, Wantel respectfully requests the issuance of a standard protective order.

2 Respectfully submitted this 1st day of April, 2005.

3 ATER WYNNE LLP

4 By: 

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1 **CERTIFICATE OF SERVICE**

2 **UM 1190**

3 I hereby certify that a true and correct copy of **WANTEL INC.'S MOTION FOR**
4 **PROTECTIVE ORDER** was served on the following parties on the 1st day of April, 2005 via
5 the methods stated below:


6 Alex M. Duarte
7 Qwest
8 421 SW Oak Street, Suite 810
9 Portland, OR 97204

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email: alex.duarte@qwest.com

10 Don Mason
11 Qwest
12 421 SW Oak Street, Suite 810
13 Portland, OR 97204

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email: don.mason@qwest.com

14
15 Dated this 1st day of April, 2005.

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17 
18 _____
19 Karen M. Lis