

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 **UM _____**

4
5 APPLICATION OF Umpqua Indian Development
6 Corporation Telecommunications Division, d/b/a
7 Rio Communications
8 FOR DESIGNATION AS AN ELIGIBLE
9 TELECOMMUNICATIONS CARRIER
10 PURSUANT TO THE TELECOMMUNICATIONS
11 ACT OF 1996 -- NON-RURAL AREAS

MOTION FOR ISSUANCE
OF STANDARD
PROTECTIVE ORDER

12 Pursuant to OAR 860-012-0035(1)(k), Umpqua Indian Development Corporation
13 Telecommunications Division d/b/a Rio Communications (“Rio Communications”) hereby
14 respectfully requests entry of a protective order in this proceeding to limit disclosure of
15 confidential information. Rio Communications requests that the Public Utility Commission of
16 Oregon (the “Commission”) issue the standard protective order adopted by the Commission.

17 Rio Communications plans to submit sensitive and proprietary information in support of
18 its Application for Designation as an Eligible Telecommunications Carrier Pursuant to the
19 Telecommunications Act of 1996, such as Rio Communications’ projections and strategic plans.
20 Rio Communications will be exposed to competitive injury if it is forced to make unrestricted
21 disclosure of its confidential business information.

22 OAR 860-011-0000(3) provides that the Oregon Rules of Civil Procedure (“ORCP”)
23 govern these proceedings. ORCP 36C(7) provides for the issuance of a protective order
24 providing that “a trade secret or other confidential research, development, or commercial
25 information not be disclosed or be disclosed only in a designated way.” Rio Communications
26 requests the entry of the standard protective order to protect such information by limiting

1 disclosure to specified persons, and requiring those persons to use the information only for
2 purposes of this proceeding.

3 WHEREFORE, Rio Communications respectfully requests the issuance of the
4 Commission's standard protective order in this docket.

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7 Respectfully submitted this 30th day of October, 2006.

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24 RIO COMMUNICATIONS

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