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Carla M. Butler
Lead Paralegal

March 22, 2006

Carol Hulse
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UX-30

Dear Ms. Hulse:

Enclosed for filing please find an original and (5) copies of Qwest Corporation's Motion for Adoption of Standard Protective Order, along with a certificate of service.

If you have any question, please do not hesitate to give me a call.

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UX 30

In the Matter of

QWEST CORPORATION

Petition to Exempt from Regulation Billing
and Collection Services

**QWEST’S MOTION FOR ADOPTION
OF STANDARD PROTECTIVE ORDER**

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

ORCP 36 C(7) provides for the issuance of a protective order that “a trade secret or other confidential research, development, or commercial information not be disclosed or be disclosed only in a designated way.” Good cause exists for the issuance of a protective order. This proceeding will soon involve the filing of testimony by Commission Staff, and possibly by Qwest, regarding Staff’s recommendation that the Commission deregulate Qwest’s billing and collection services (“B&C services”) that are set forth in section 8 of Qwest’s Access Services Price List and that are at issue in this deregulation docket. The issues that may require Staff or Qwest to disclose sensitive, proprietary, and confidential information include information regarding Qwest’s B&C services revenues and the decreases in such revenues. Indeed, Qwest understands that the testimony that Staff intends to file shortly will include such confidential Qwest B&C services revenue information.

Unprotected disclosure of this information could benefit Qwest's competitors. Such information could be used by Qwest’s competitors and wholesale customers to their commercial 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 by others, and is valuable. Qwest has taken stringent measures to safeguard the confidentiality of the information.

Accordingly, Qwest seeks the issuance of the Commission's standard protective order so that Staff's confidential testimony can be filed pursuant to that protective order, and so that Qwest may file confidential testimony in any subsequent testimony, if necessary. In short, the Commission should enter its standard protective order to limit the use and disclosure of such confidential information.

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

DATED: March 22, 2006.

QWEST CORPORATION



By _____
Alex M. Duarte, OSB No. 02045
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(503) 242-5623
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Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

UX 30

I hereby certify that on the 22nd day of March 2006, I served the foregoing **QWEST CORPORATION'S MOTION FOR ADOPTION OF STANDARD PROTECTIVE ORDER** in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon.

Jeff Bissonnette
Citizens' Utility Board of Oregon
610 SW Broadway, Ste 308
Portland, OR 97205-3404

Jason Eisdorfer
Citizens' Utility Board of Oregon
610 SW Broadway, Ste 308
Portland, OR 97205

David Hatton
Department of Justice
Regulated Utility &
Business Section
1162 Court St., NE
Salem, OR 97301-4096

DATED this 22nd day of March, 2006.

QWEST CORPORATION



By: _____

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