Winslow F. Bouscaren Qwest Services Corporation 1005 17<sup>th</sup> Street, Suite 200 Denver, CO 80202 (303) 896-1518 (303) 896-6095 (fax) wbousca@qwest.com

Gregory B. Monson (2294)
Ted D. Smith (3017)
STOEL RIVES LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111
(801) 328-3131
(801) 578-6999 (fax)
gbmonson@stoel.com
tsmith@stoel.com

Attorneys for Qwest Corporation

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Complaint of :

Docket No. 01-049-75

BEAVER COUNTY, et al.

VS.

.

Complainants,

MOTION FOR ENTRY OF PROTECTIVE ORDER

QWEST CORPORATION fka U S WEST

COMMUNICATIONS, INC., fka MOUNTAIN STATES TELEPHONE &

TELEGRAPH SERVICES, INC.

.

Respondent.

Respondent.

Qwest Corporation ("Qwest") hereby moves the Public Service Commission to enter a Protective Order in this docket in the form attached hereto. The grounds for this Motion are as follows:

- 1. Parties in this docket have propounded data requests to Qwest requesting the production of proprietary information. Qwest has responded to the data requests in part, but withheld responses containing proprietary information.
- 2. It is expected that parties in this proceeding may request the production of other information which is proprietary in nature. The entry of the proposed Protective Order will expedite and facilitate the exchange of information by the parties by affording protection to valuable confidential, trade secret, and proprietary business information.
- 3. The entry of the proposed Protective Order will also afford protection to the Commission as well as parties who might review the information and subsequently be requested to reveal its contents inasmuch as the proposed Protective Order sets forth clear parameters for use of confidential information.
- 4. The entry of the proposed Protective Order will enable this Commission to adequately review the information that is provided pursuant to the Protective Order so that it may have sufficient information upon which to make decisions.
  - 5. The proposed Protective Order is fair and equitable to all parties.
- 6. The proposed Protective Order is identical to the Protective Order entered by the Commission in Docket No. 02-049-82.

Based on the foregoing Qwest requests that the Commission enter the Protective Order in the form attached hereto.

## RESPECTFULLY SUBMITTED: October 23, 2002.

Gregory B. Monson Ted D. Smith STOEL RIVES LLP

Attorneys for Qwest Corporation

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 23, 2002, true and complete copies of the foregoing MOTION FOR PROTECTIVE ORDER were served on the following by hand delivery:

Michael Ginsberg Assistant Attorney General 500 Heber M. Wells Building 136 East Third South Salt Lake City, UT 84114 Atmain.mginsber@state.ut.us

Reed Warnick Assistant Attorney General 400 Heber M. Wells Building 160 East 300 South Salt Lake City, Utah 84111 Atmain.rwarnick@state.ut.us

Kent Walgren Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, Utah 84111

Bill Thomas Peters David W. Scofield PARSONS, DAVIES, KINGHORN & PETERS 185 South State Street, Suite 700 Salt Lake City, Utah 84111