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Attorneys for Qwest Corporation

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In Regard to the Request of ALL WEST COMMUNICATIONS, INC. for Revision to Exchange Boundaries

Docket No. 02-2270-01

## MOTION FOR PROTECTIVE ORDER

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

- 1. 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.
- 2. The proposed Protective Order is fair and equitable to all parties and provides the parties and the Commission with access to information while allowing for the protection of the integrity of confidential information.

3. The proposed Protective Order is in the same form as Protective Orders entered by the Commission in recent cases involving other utilities under its jurisdiction, including the Protective Order entered March 14, 2006 in Docket No. 06-049-40.

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

RESPECTIVELY SUBMITTED: September 13, 2006.

Gregory B. Monson Stoel Rives LLP

Melissa K. Thompson Corporation Counsel Qwest Services Corp.

Attorneys for Qwest Corporation

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing MOTION FOR

**PROTECTIVE ORDER** was served on the following by electronic mail at the address

shown on September 13, 2006:

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/s/ Gregory B. Monson\_\_\_\_