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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION)
OF QWEST CORPORATION FOR)
ARBITRATION OF AN INTERCONNECTION)
AGREEMENT WITH UNION TELEPHONE) Docket No. 04-049-145
COMPANY d/b/a UNION CELLULAR UNDER § 252)
OF THE FEDERAL TELECOMMUNICATIONS ACT)

**RESPONSE OF UNION TELEPHONE COMPANY TO
MOTION FOR PROTECTIVE ORDER**

Union Telephone Company (“Union), by and through its undersigned counsel, hereby responds to the Motion of Qwest Corporation (“Qwest”) for a Protective Order in regard to Union’s Notice of Deposition Duces Tecum.

1. Union is aware of Qwest’s concern in regard to the Notice of Deposition Duces Tecum. Counsel for Qwest and Union have spoken in regard to the matter and have reached a resolution with respect to the noticed deposition. Counsel agree that the deposition scheduled for tomorrow, July 17, 2006, of a Rule 30(b)(6) Qwest designee will be continued. A possible deposition may be scheduled if the contemplated informal proceedings are not satisfactory.

2. The Parties have agreed to address Union's discovery request informally and to revisit the possibility of a deposition only if the matter is not resolved.
3. Qwest is in agreement with respect to this resolution.

DATED this 17th day of July, 2006.

s/bsa

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via electronic mail and/or first class mail (postage prepaid) on the 17th day of July, 2006, addressed as follows:

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s/bsa

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