

David R. Irvine (1621)
Attorney for Petitioner
747 East South Temple, Suite 130
Salt Lake City, UT 84102
Telephone: (801) 579-0802
Facsimile: (801) 579-0801

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of)	
Beehive Telephone Co., Inc. for an)	MOTION FOR PROTECTIVE
Increase in Rates and Participation in)	ORDER
the Universal Telecommunications)	
Service Support Fund.)	Docket No. 14-051-01
)	
)	

1. Petitioner Beehive Telephone Co., Inc. ("Petitioner" or "the Company" hereinafter), hereby moves the Commission for a Protective Order in this docket, in the form accompanying this motion. The grounds for this motion are as follows:

2. Petitioner is filing its Petition seeking an in its rates and participation in the Universal Public Telecommunications Service Support Fund. Certain of the exhibits and documents to be filed with the Petition are confidential and contain proprietary information. 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. Without a protective order in place,

the parties may be reluctant to disclose pertinent information and the Company's competitive interests could be significantly damaged.

3. Approval of the proposed Protective Order will 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 the use of confidential information.

4. Approval and entry of the proposed Protective Order will enable the 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 a fully-informed decision in this matter.

5. The proposed Protective Order is fair and equitable to all parties.

6. Based upon the foregoing, Petitioner requests that the Commission approve and enter the Protective Order in the form accompanying this motion.

DATED this 31st day of October, 2014.

/s/ _____
David R. Irvine
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for a Protective Order to be served this 31st day of October, 2014, via electronic mail, to the following:

Justin Jetter, Esq.
Assistant Attorney General
jjetter@utah.gov

Rex Olsen, Esq.
Assistant Attorney General
rolsen@utah.gov

/s/ _____
David R. Irvine