



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.

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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