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Gunnison Telephone Company, Manti Telephone Company, South Central Utah Telecommunications Association, Inc.,
Uintah Basin Telecommunications Association,
Inc. and UBET Telecom, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION OF WWC HOLDING CO., INC. FOR ARBITRATION OF AN
INTERCONNECTION AGREEMENT

Motion for Protective Order

Docket No.: 03-2403-02

Carbon/Emery Telcom, Inc., Emery Telephone and Hanksville Telcom, Inc. (collectively "Emery"), Gunnison Telephone Company ("Gunnison"), Manti Telephone Company ("Manti"), South Central Utah Telecommunications Association, Inc. ("South Central"), Uintah Basin Telecommunications Association, Inc. and UBET Telecom, Inc. (collectively "UBTA"), certificated Utah rural incumbent local exchange carriers (hereinafter collectively the "ILECs" or "Utah ILECs" hereby move that the Public Service Commission of Utah (the "Commission") enter into a Protective Order in the form attached hereto. The grounds for this Motion are as follows:

1. A Petition for Arbitration of an Interconnection Agreement (the "Petition") has been filed by WWC Holding Co., Inc. ("Western Wireless").
2. The Utah ILECs have received, and anticipate the possibility of receiving additional, data requests calling for the production of information belonging to them which are trade secrets, or are proprietary or confidential in nature.

3. The entry of the proposed Protective Order will expedite the production of documents and other information, and will afford the necessary protection to valuable, confidential, trade secret, business information. It 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 order sets forth clear parameters for use of confidential information. Further, it will protect the confidential information of any other parties which might be provided during the course of these proceedings.

3. The entry of the proposed Protective Order will enable this Commission and other parties to adequately review the documentation which is provided pursuant to such Protective Order that it may have sufficient background upon which to enter its findings.

4. The proposed Protective Order is fair and equitable to all parties and provides the Commission with the opportunity to review information sought by the parties and at the same time allow for protection of the integrity of private property. The proposed Protective Order and Agreement to be executed thereunder will strike a reasonable balance between the desire for a fair production of documents and the protection of trade secret property as well as expedite the production of documents and other information to parties seeking to prepare for hearing.

5. The proposed Protective Order is substantially the same as the Orders entered by the Commission in prior cases.

6. Western Wireless has indicated that it has no objection to the proposed Protective Order being entered.

THEREFORE, the Utah ILECs request that the Commission enter the Protective Order in the form attached hereto.

DATED this ____ day of August, 2003.

BLACKBURN & STOLL, L.C.

Jerry D. Fenn
Attorneys for Carbon/Emery Telcom, Inc., Emery Telephone, Hanksville
Telcom, Inc. Gunnison Telephone Company, Manti Telephone Company,

CERTIFICATE OF MAILING

I hereby certify that on this ____ day of August, 2003, I caused to be mailed a true and correct copy of the foregoing MOTION FOR PROTECTIVE ORDER and proposed PROTECTIVE ORDER by first-class mail, postage prepaid to:

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