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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Petition of QWEST CORPORATION for Arbitration of an Interconnection Agreement with UNION TELEPHONE COMPANY d/b/a UNION CELLULAR under Section 252 of the Federal Telecommunications Act of 1996	DOCKET NO. 04-049-145 <b>MOTION FOR PROTECTIVE ORDER</b>
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Union Telephone Company (“Union”) hereby moves the Commission to enter a Protective Order in this docket, 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. Union has already provided an exhibit that requires the protection of a Protective Order.

2. The entry of the proposed Protective Order will also afford protection to the Commission, as well as to parties who might review the information and subsequently be requested to reveal its contents, inasmuch as the proposed Protective Order sets forth clear directions for use of confidential information.

3. The 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 decisions.

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

5. The proposed Protective Order is in the same form as that used in recent dockets.

Based on the foregoing Union requests that the Commission enter the Protective Order in the form attached hereto.

Respectfully submitted this 19<sup>th</sup> day of October, 2005.

Callister Nebeker & McCullough

Stephen F. Mecham

## CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of October, 2005, I caused to me emailed true and correct copies of the foregoing MOTION FOR PROTECTIVE ORDER and a draft PROTECTIVE ORDER in Docket No. 04-049-145 to the following:

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