

STANLEY K. STOLL (A3960)
BLACKBURN & STOLL, LC
Attorneys for UBET Telecom, Inc.
and Uintah Basin Telecommunications Association, Inc.
257 East 200 South, Suite 800
Salt Lake City, Utah 84111
Telephone: (801) 521-7900

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Uintah Basin Telecommunications Association, Inc., and UBET Telecom, Inc., for an Order of the Commission Approving the Combination, Merger and Consolidation of UBET Telecom, Inc., and Uintah Basin Telecommunications Association, Inc.

Motion for Protective Order

Docket No.: 04-053-03

Uintah Basin Telecommunications Association, Inc. ("UBTA") and UBET Telecom, Inc. ("UBET"), 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. UBTA and UBET filed their Joint Application with the Commission to approve the combination, merger and consolidation of UBET and UBTA.
2. UBTA and UBET have received 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 filing of the agreement as well as 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.

THEREFORE, UBTA and UBET request that the Commission enter the Protective Order in the form attached hereto.

DATED this 20th day of September, 2004.

Uintah Basin Telecommunications Association, Inc.
UBET Telecom, Inc.

Stanley K. Stoll
Blackburn & Stoll, LC
Attorneys for UBTA and UBET

CERTIFICATE OF MAILING

I hereby certify that on this 20th day of September, 2004, I caused to be mailed a true and correct copy of the foregoing MOTION FOR PROTECTIVE ORDER by first-class mail, postage prepaid to:

Michael Ginsberg
Assistant Attorney General
Division of Public Utilities

Paul Proctor

Assistant Attorney General
Committee of Consumer Services

Stanley K. Stoll