

Winslow B. Waxter
Robert C. Brown
Qwest Services Corporation
1005 17th Street, Suite 200
Denver, CO 80209
Telephone: 303-896-1518
Facsimile: 303-896-6095
Email: winslow.waxter@qwest.com
robert.brown@qwest.com

Mary Rose Hughes
PERKINS COIE LLP
607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005-2011
Telephone: 202-628-6600
Facsimile: 202-434-1690
Email: mhughes@perkinscoie.com

Ted D. Smith (3017)
STOEL RIVES LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111
Telephone: 801-328-3131
Facimile: 801-578-6999
tsmith@stoel.com

Attorneys for Qwest Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION	:	Docket No. 04-2277-02
OF DIECA COMMUNICATIONS, INC.,	:	
D/B/A COVAD COMMUNICATIONS	:	MOTION FOR ENTRY OF
COMPANY, FOR ARBITRATION TO	:	PROTECTIVE ORDER
RESOLVE ISSUES RELATING TO AN	:	
INTERCONNECTION AGREEMENT	:	
WITH QWEST CORPORATION	:	

Qwest Corporation (“Qwest”) 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.

2. It is expected that the parties will propound discovery requests that will request the production of information that is proprietary in nature. Without a protective order in place, the parties may withhold pertinent information from their responses.

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 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.

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. 04-049-09 .

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

RESPECTFULLY SUBMITTED: May 24, 2004.

Ted D. Smith
STOEL RIVES LLP

Robert C. Brown
Qwest Services Corporation

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing MOTION FOR PROTECTIVE ORDER was mailed by U.S. Mail, postage prepaid, and electronically mailed to the following on this 24th day of May, 2004:

Stephen F. Mecham
Callister, Nebeker & McCullough
Gateway Tower East, Suite 900
10 East South Temple
Salt Lake City, UT 84133
Email: sfmecham@cnmlaw.com

Karen Shoresman Frame
Senior Counsel
Caovad Communications Company
7901 Lowry Boulevard
Denver, CO 80230
Email: kframe@covad.com
