

David R. Irvine (1621)
Attorney for Petitioners
350 South 400 East, Ste. 201
Salt Lake City, UT 84111
Telephone: (801) 363-4011

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of)	Motion for Protective Order
)	
Direct Communications Cedar Valley, LLC)	
and Its Petition to Establish a Rate Base.)	Docket No. 06-2419-01
)	

1. Petitioner Direct Communications Cedar Valley, LLC (“DCCV” hereinafter), hereby moves the Commission to enter a Protective Order in this docket, in the form accompanying this motion. The grounds for this motion are as follows:

2. DCCV has filed its Petition seeking establishment and confirmation of the company’s rate base for its telephone system at Eagle Mountain, Utah. It is anticipated that the Division of Public or other parties will engage in discovery which will call for the production of information and documents, some of which may be designated by DCRI and DCCV as proprietary information. In addition, DCCV is providing Exhibits 1 and 2 to its Petition, which are a confidential facilities and equipment account summary and a confidential schedule of proposed depreciation rates and lives, respectively. 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. Without a protective order in place, the parties

may be reluctant to disclose pertinent information and DCCV's competitive interests could be significantly damaged.

3. Approval of the proposed Protective Order will 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 the use of confidential information.

4. Approval and 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 a fully-informed decision in this matter.

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

6. Based upon the foregoing, DCCV requests that the Commission approve and enter the Protective Order in the form accompanying this motion.

DATED this 13th day of December, 2006.

David R. Irvine
Attorney for Petitioner