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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of
Central Telcom Services, LLC, For a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Service within the State of Utah

Motion for Protective Order
Docket No.: _____

Central Telcom Services, LLC (“CTS”), hereby moves the Public Service Commission of Utah (the "Commission") to enter into a Protective Order in the form attached hereto. The grounds for this Motion are as follows:

1. CTS anticipates filing its Application with the Commission for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Services within the State of Utah.
2. CTS anticipates that the Application will contain information belonging to it which constitutes trade secrets, or are proprietary or confidential in nature.
3. The entry of the proposed Protective Order will expedite the filing of the Application 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.

4. 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.

5. 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.

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

THEREFORE, CTS requests that the Commission enter the Protective Order in the form attached hereto.

DATED this _____ day of March, 2007.

Central Telcom Services, LLC

Stanley K. Stoll
Kira M. Slawson
Blackburn & Stoll, LC
Attorneys for Petitioner

CERTIFICATE OF MAILING

I hereby certify that on this ____ day of _____, 2007, I caused to be mailed a true and correct copy of the foregoing MOTION FOR PROTECTIVE ORDER in Docket No. _____ by email and first-class mail, postage prepaid to:

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