

David R. Irvine (1621)
Attorney for Petitioners
747 East South Temple Street, Ste. 130
Salt Lake City, UT 84102
Telephone: (801) 579-0800
Telecopier: (801) 579-0801

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of Direct)	Motion for Protective Order
Communications Cedar Valley, LLC,)	
For a Rebalance of Rates and Support)	
From the State Universal Service)	Docket No. 07-2419-01
Support Fund.)	

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 a rebalancing of its rates and charges for telecommunications services at Eagle Mountain, Utah. It is anticipated that the Division of Public Utilities 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, 1.1, and 2 to its Petition, which are a

confidential revenue requirement calculation, notes to the revenue requirement calculation, and a summary of revenue sources, 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 5th day of December, 2007.

David R. Irvine
Attorney for Petitioner