

JEROLD C. LAMBERT  
BRESNAN COMMUNICATIONS, LLC  
1 Manhattanville Road  
Purchase, NY 10577  
[jlambert@bresnan.com](mailto:jlambert@bresnan.com)

THORVALD A. NELSON  
HOLLAND & HART LLP  
8390 East Crescent Pkwy, Suite 400  
Greenwood Village, CO 80111  
[tnelson@hollandhart.com](mailto:tnelson@hollandhart.com)

JOEL D. WRIGHT (10477)  
HOLLAND & HART LLP  
60 E. South Temple, Suite 2000  
Salt Lake City, UT 84111-1031  
[jdwright@hollandhart.com](mailto:jdwright@hollandhart.com)

Attorneys for Bresnan Broadband of Utah, LLC

---

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

---

In the Matter of the Application of

Motion for Protective Order

Bresnan Broadband of Utah, LLC

Docket No.: 07-2476-01

For a Certificate of Public Convenience and  
Necessity to Operate as a Competitive Local  
Exchange Carrier in Utah

---

Bresnan Broadband of Utah, LLC ("Bresnan"), 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. Bresnan filed 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 on February 5, 2007.
2. Bresnan's Application contains information belonging to it which constitutes trade

secrets, or are proprietary or confidential in nature and Bresnan has received a Data Request from the Public Utilities Division of Utah (the “Division”) also requesting such information.

3. The entry of the proposed Protective Order will expedite the filing of the response to the Data Request 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 so 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, Bresnan requests that the Commission enter the Protective Order in the form attached hereto.

DATED this 17th day of April, 2007.

Bresnan Broadband of Utah, LLC

---

Joel D. Wright  
Holland & Hart LLP  
Attorneys for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17 day of April, 2007, an original, five (5) true and correct copies, and an electronic copy of the foregoing **MOTION FOR PROTECTIVE ORDER** were hand-delivered to:

Ms. Julie Orchard  
Commission Secretary  
Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114  
[mlivingston@utah.gov](mailto:mlivingston@utah.gov)

and a true and correct copy, hand-delivered to both:

Michael L. Ginsberg, Esq.  
Patricia Schmid  
Assistant Attorney Generals  
Office of the Utah Attorney General  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114  
[mginsberg@utah.gov](mailto:mginsberg@utah.gov)  
[pschmid@utah.gov](mailto:pschmid@utah.gov)

Casey J. Coleman, Utility Analyst  
Dennis Miller, Legal Assistant  
State of Utah  
Division of Public Utilities  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114  
[ccoleman@utah.gov](mailto:ccoleman@utah.gov)  
[dennismiller@utah.gov](mailto:dennismiller@utah.gov)

and a true and correct copy sent via first class mail, or emailed in PDF format, to the following:

Stanley K. Stoll (3960)  
Kira M. Slawson (7081)  
BLACKBURN & STOLL, LC  
257 East 200 South, Suite 800  
Salt Lake City, Utah 84111  
[sstoll@blackburn-stoll.com](mailto:sstoll@blackburn-stoll.com)  
[kslawson@blackburn-stoll.com](mailto:kslawson@blackburn-stoll.com)  
Attorneys for UBTA-UBET Communications, Inc.

Stephen F. Mecham (4089)  
Callister Nebeker & McCullough  
10 East South Temple, Suite 900  
Salt Lake City, Utah 84133  
[sfmecham@cnmlaw.com](mailto:sfmecham@cnmlaw.com)  
Attorney for the Utah Rural Telecom Association

Eric Orton  
Utah Committee of Consumer Services  
Heber M. Wells Building  
160 East 300 South, Suite 200  
PO Box 146782  
Salt Lake City, UT 84114-6782  
[eorton@utah.gov](mailto:eorton@utah.gov)

Paul H. Proctor (#2657)  
Reed T. Warnick (#3391)  
Assistant Attorneys General  
Utah Committee of Consumer Services  
160 East 300 South  
P.O. Box 140857  
Salt Lake City, Utah 84114-0857  
[pproctor@utah.gov](mailto:pproctor@utah.gov)  
[rwarnick@utah.gov](mailto:rwarnick@utah.gov)

---

Joel D. Wright

3696561\_2.DOC