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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE INCREASE OF
RATES AND CHARGES BY
CARBON/EMERY TELCOM, INC.

Motion for Protective Order
Docket No.:

Carbon/Emery Telcom, Inc. hereby moves that the Public Service Commission of Utah (the "Commission") enter into a Protective Order in the form attached hereto, which is the template form suggested by the Commission. The grounds for this Motion are as follows:

1. Carbon/Emery Telcom, Inc. has filed, or will file, an Application for Rate Increase and USF Eligibility which contains confidential financial information, trade secrets and other proprietary information.
2. Carbon/Emery Telcom, Inc. anticipates the possibility of receiving data requests calling for the production of information belonging to them which are trade secrets, or are proprietary or confidential in nature.
3. The entry of the proposed Protective Order will expedite the filing of the agreement 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 the same as the Orders entered by the Commission in prior cases, and is in the form suggested by the Commission.

THEREFORE, Carbon/Emery Telcom, Inc. requests that the Commission enter the Protective Order in the form attached hereto.

DATED this _____ day of June, 2009.

BLACKBURN & STOLL, LC

Stanley K. Stoll
Kira M. Slawson
Blackburn & Stoll, LC
Attorneys for Carbon/Emery Telcom, Inc.

CERTIFICATE OF MAILING

I hereby certify that on this ____ day of June, 2009, I caused to be sent by electronic mail a true and correct copy of the foregoing MOTION FOR PROTECTIVE ORDER, to:

Michael Ginsberg
Assistant Attorney General
Division of Public Utilities
mginsberg@utah.gov

Paul Proctor
Assistant Attorney General
Committee of Consumer Services
pproctor@utah.gov

Kira M. Slawson