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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of)	MOTION FOR PROTECTIVE
Direct Communications Cedar Valley,)	ORDER
LLC, for a Review of Rates and)	
Support from the State Universal)	
Service Support Fund.)	Docket No. 09-2419-01

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

2. Petitioner has filed its Petition seeking review of its rates and support from the Utah Universal Service Fund ("Utah USF" hereinafter). It is anticipated that the Division of Public ("the Division" hereinafter) or other parties will engage in discovery which will call for the production of information and documents, some of which may be designated by the Company as proprietary information. In addition, the Company is providing Exhibits 1, 1.2, and 2 to its Petition, which are confidential and proprietary documents detailing its revenue requirement, revenue sources, and related notes and data, 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 the Company'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, Petitioner requests that the Commission approve and enter the Protective Order in the form accompanying this motion.

DATED this 14th day of September, 2009.


David R. Irvine
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