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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of)	
Beehive Telephone Co., Inc. for an)	MOTION FOR PROTECTIVE
Immediate Increase in Rates.)	ORDER
)	
)	Docket No. 13-051-01
)	

1. Petitioner Beehive Telephone Co., Inc. (“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 an immediate increase in its rates in accordance with a requirement of the Federal Communications Commission (“FCC” hereinafter). Certain of the exhibits (1, 1.1, 2, and 3)) and documents filed with the Petition are confidential and proprietary information. 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 24th day of September, 2013.

David R. Irvine
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for a Protective Order to be served this 24th day of June, 2013, via electronic mail, to the following:

Justin Jetter, Esq.
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