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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1017(3)

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Investigation into Expansion of the Oregon  
Universal Service Fund to Include the Service  
Areas of Rural Telecommunications Carriers

MOTION FOR ENTRY OF GENERAL  
PROTECTIVE ORDER

Pursuant to OAR 860-001-0080(1), the Oregon Exchange Carrier Association ("OECA") respectfully requests entry of the Commission's general protective order in this proceeding. OECA believes good cause exists for issuance of such an order to protect confidential business information. In support of this motion, OECA states the following:

1. The Commission's rules authorize a party to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See OAR 860-001-0000(1) (adopting Oregon Rules of Civil Procedure ("ORCP"); ORCP 36(C)(7) (providing protection against unrestricted discovery of "a trade secret or other confidential research, development, or commercial information"). See, also, In re Investigation into the Cost of Providing Telecommunications Service (Docket UM 351), Order No. 91-500 (1991) (recognizing that

MOTION FOR ENTRY OF GENERAL  
PROTECTIVE ORDER - 1

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1 protective orders are a reasonable means to protect "the rights of a party to trade secrets and other  
2 confidential commercial information" and "to facilitate the communication of information between  
3 litigants").

4 2. Good cause exists for the issuance of a protective order in this proceeding. One of  
5 the elements of this proceeding is the company specific information concerning access traffic  
6 delivered to or from members of OECA. That information contains proprietary information of both  
7 the member companies of OECA and individual interexchange carriers. Issuance of a protective  
8 order will allow other parties in the proceeding to have an opportunity to review proprietary  
9 information.

10  
11 3. Accordingly, OECA seeks the issuance of the Commission's general protective order  
12 to limit the use and disclosure of confidential business information.

13 Dated July 5, 2011.

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15  
16 By: 

17 RICHARD A. FINNIGAN, OSB No. 965357  
18 Attorney for the Oregon Exchange Carrier  
19 Association

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**CERTIFICATE OF SERVICE**  
**UM 1017(3)**

I certify that I have this day sent the attached Motion for Entry of General Protective Order by electronic mail and U.S. mail to the following:

FILING CENTER  
PUBLIC UTILITY COMMISSION OF OREGON  
550 CAPITOL STREET NE STE 215  
SALEM, OR 97301-2551  
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I further certify that I have this day sent the attached Motion for Entry of General Protective Order by electronic mail pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

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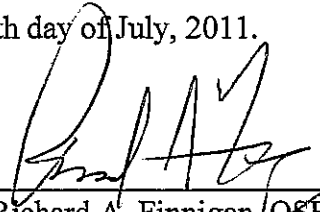
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Dated at Olympia, Washington, this 5th day of July, 2011.

  
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July 5, 2011

**VIA E-MAIL AND U.S. MAIL**

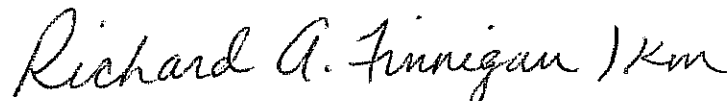
Filing Center  
Oregon Public Utility Commission  
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Salem, OR 97301-2551

Re: UM 1017(3) – Motion for Entry of General Protective Order

Dear Sir/Madam:

Enclosed are the original and one copy of a Motion for Entry of General Protective Order and Certificate of Service.

Sincerely,



RICHARD A. FINNIGAN

RAF/km  
Enclosures

cc: Service List (via e-mail)  
Brant Wolf (via e-mail)  
Craig Phillips (via e-mail)  
Member Companies (via e-mail)