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December 26, 2006

**VIA ELECTRONIC MAIL AND U.S. MAIL**

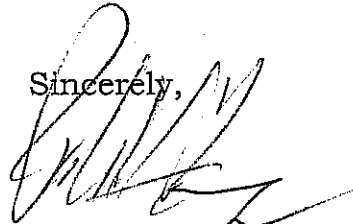
Filing Center  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97308-2148

Re: UM 1280 – Motion for Protective Order

Dear Sir/Madam:

Enclosed are a Motion for Protective Order and Certificate of Service for the above-referenced matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/km  
Enclosures

cc: Service List (w/encl., via U.S. mail)  
Brant Wolf (w/encl., via e-mail)

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1280

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

MOTION FOR PROTECTIVE ORDER

Investigation to Determine whether Rural  
Incumbent Local Exchange Carriers Should  
Disaggregate Universal Service Support.

TO: Public Utility Commission of Oregon

The Oregon Telecommunications Association ("OTA"), by and through its attorney of record,  
Richard A. Finnigan, hereby files this Motion requesting that a standard form of Protective Order be  
issued in this case.

BASIS FOR MOTION

OTA has received a set of data requests submitted jointly by Rural Cellular Corporation and  
United States Cellular Corporation. Those data requests may call for the inclusion of confidential  
information in the responses submitted by OTA to those requests. In addition, certain of OTA members

MOTION FOR PROTECTIVE ORDER- 1

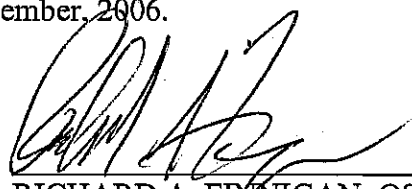
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1 have received data requests<sup>1</sup> from Commission Staff which clearly call for the disclosure of confidential  
2 information. Without a Protective Order, such confidential information will not be disclosed in Docket  
3 UM 1280.

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5 CONCLUSION

6 Based on the foregoing, OTA respectfully requests that a Protective Order be issued in this  
7 matter.

8 Respectfully submitted this 26th day of December, 2006.

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11 RICHARD A. FINNIGAN, OSB No. 96535  
12 Attorney for the Oregon Telecommunications  
13 Association

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23 <sup>1</sup> The data requests issued by Commission Staff to certain OTA members who are not parties in UM 1280 and are, thus,  
24 technically deficient. However, OTA has been in communication with Commission Staff concerning the issue. OTA and  
25 Staff have agreed that they will deem the Staff data requests addressed to certain OTA members as addressed to OTA.

CERTIFICATE OF SERVICE  
UM 1280

I hereby certify that I have this day served the foregoing Motion for Protective Order upon all parties of record in this proceeding by mailing a copy thereof, properly addressed with postage prepaid, to the following parties or attorneys of parties:

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Dated at Olympia, WA this 26th day of December, 2006.

By:   
RICHARD A. FINNIGAN, OSB No. 96535  
Attorney for the Oregon Telecommunications  
Association