



Qwest

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Carla M. Butler

Lead Paralegal

February 25, 2011

Carol Hulse
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: UM 1481

Dear Ms. Hulse:

Enclosed for filing in the above entitled matter please find an original and (1) copy of Qwest Corporation's Motion for Adoption of the Commission's Standard Protective Order, along with a certificate of service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:
Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1481, Phase II

In the Matter of
PUBLIC UTILITY COMMISSION OF
OREGON
Staff Investigation of the Oregon Universal
Service Fund

**QWEST CORPORATION'S MOTION
FOR ADOPTION OF THE
COMMISSION'S STANDARD
PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), Qwest Corporation ("Qwest") hereby respectfully requests entry of the Commission's standard protective order for this proceeding in order to limit disclosure of confidential information. Thus, Qwest requests that the Public Utility Commission of Oregon ("the Commission") issue its standard protective order.

ORCP 36 C(7) provides for the issuance of a protective order that "a trade secret or other confidential research, development, or commercial information not be disclosed or be disclosed only in a designated way." Good cause exists for the issuance of a protective order for this docket. This docket is the Commission's investigation of the Oregon Universal Service ("OUS") fund. It is anticipated that this docket will involve the confidential information of Qwest, and other parties. Indeed, Staff has recently issued a series of data requests seeking confidential information, and other parties have requested copies of Qwest's responses.

Because of the nature of the issues in this proceeding, there is a need to produce and/or file confidential information in this docket. Accordingly, Qwest hereby requests the immediate issuance of the Commission's standard protective order.

Finally, unprotected disclosure of this information could benefit Qwest's competitors. Such information could be used by Qwest's competitors to their commercial advantage, and to Qwest's commercial disadvantage, resulting in monetary loss to Qwest, and ultimately, its

customers. The information sought is proprietary, cannot be easily duplicated or acquired by others, and is valuable. Finally, Qwest has taken stringent measures to safeguard the confidentiality of the information.

Accordingly, the Commission should enter its standard protective order to limit the use and disclosure of such confidential information, and should do so as soon as possible.

WHEREFORE, Qwest respectfully requests the issuance of the Commission's standard protective order.

DATED: February 25, 2011

QWEST CORPORATION



By _____

Alex M. Duarte, OSB No. 020459

Qwest Corporation

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Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

UM 1481

I hereby certify that on the 25th day of February 2011, I served the foregoing **QWEST CORPORATION'S MOTION FOR ADOPTION OF THE COMMISSION'S STANDARD PROTECTIVE ORDER** for the above entitled docket on the following persons via e-mail transmission, and via U.S. Mail, by mailing a correct copy to those not waiving service in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon on February 28, 2011.

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DATED this 25th day of February, 2011.

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(w) = Waive Paper Service