

**ATTACHMENT 4:**  
**COPY OF QWEST JUNE 25, 2007 COVER LETTER**

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**Alex M. Duarte**  
Corporate Counsel

June 25, 2007

Administrative Hearings Division  
Public Utility Commission of Oregon  
P. O. Box 2148  
Salem, OR 97308-2148

Re: UM - Draft Protective Order based on Protective Order in docket UM 1251

Dear Administrative Hearings Division:

On Friday, June 22, 2007, Qwest Corporation ("Qwest") filed a new petition requesting that the Commission open a docket for approval of Qwest's 2007 additions to its non-impaired wire center list as set forth in the Commission's Order No. 07-109 in the Commission's initial *TRRO* non-impaired wire center proceeding, docket UM 1251 and the joint settlement agreement between Qwest and a coalition of CLECs ("the Joint CLECs") that Qwest concurrently filed for Commission approval in docket UM 1251. In addition, pursuant to the Commission's Order No. 07-109 in docket UM 1251 and the settlement agreement filed for approval in docket UM 1251, Qwest requested that the Commission issue on an *expedited basis* a protective order based on the model protective order attached that it attached as Attachment A. Qwest and the Joint CLECs in docket UM 1251 negotiated and agreed to this protective order in order to allow Qwest to file confidential wire center information regarding "business line" counts and the number of "fiber-based collocators" as defined in the FCC's *Triennial Review Remand Order* ("*TRRO*"),<sup>1</sup> in the Commission's Order No. 07-109 in docket UM 1251, and in the settlement agreement filed in docket UM 1251 for which the parties seek Commission approval.

In any event, the model protective order Qwest submitted with its petition was based on the agreed-upon protective order in Minnesota. The parties agreed in the settlement agreement that Qwest would seek the prompt issuance of a protective order "based on" that Minnesota protective order, and thus Qwest did so. However, in the event the Commission prefers to use a protective order that it has previously used, such as, for example, the modified protective order in docket UM 1251 (which involved similar issues), Qwest hereby submits a Word version of a draft protective order that is based entirely on the modified protective order that the Commission adopted in docket UM 1251 (Order No. 06-141). The only changes are blanks for the docket number and order number for this new docket, and a slight change to the opening paragraph (since this draft protective order would not supersede any particular standard protective order).

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<sup>1</sup> Order on Remand, *In the Matter of Review of Unbundled Access to Network Elements, Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, WC Docket No. 04-313 (FCC rel. February 4, 2005) (hereafter "*Triennial Review Remand Order*" or "*TRRO*").

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Finally, whether the Commission determines to issue a protective order identical to the Minnesota protective order, or identical to the modified protective order in docket UM 1251, or decides to issue a different protective order altogether, Qwest respectfully requests that the Commission issue a protective order on an expedited basis and as soon as possible so that the CLECs who are interested in obtaining the confidential wire center data that Qwest will file on June 29, 2007 to support its non-impaired wire center list additions will have an opportunity to sign the protective order and receive the confidential data as soon as possible.

Thank you for your attention to this matter. If you have any questions regarding this matter, please feel free to call me at your convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alex M. Duarte', written in a cursive style.

Alex M. Duarte

cc Service List from docket UM 1251