

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Qwest’s Petition to be Regulated Under an Alternative Form of Regulation Pursuant to RCW 80.36.135

Docket No. UT-061625

**QWEST’S MOTION FOR AMENDED PROTECTIVE ORDER FOR HIGHLY CONFIDENTIAL INFORMATION**

- 1 Pursuant to WAC 480-07-423(2), Qwest hereby moves the Commission to amend the standard protective order in this matter to create a “Highly Confidential” designation for certain information. The documents for which Highly Confidential protection is requested are being provided to Staff and Public Counsel in response to a Public Counsel Data Request. At this time, pending a Commission ruling on this motion, Qwest is not providing the material to the other parties in this case.
  
- 2 The Highly Confidential documents contain highly sensitive competitive information, including Qwest’s analysis of competition and competitors, not just with regard to past or present facts, such as line loss, take rates, etc., but also with regard to future plans, actions and strategies Qwest might employ. This information would be considered trade secret in any industry, and would not be available for review, especially by competitors. Qwest would be immeasurably harmed if this information was released or disseminated more broadly than absolutely necessary for this docket.

- 3 Qwest believes its interests will be protected so long as the Highly Confidential information is released only to Staff and Public Counsel, but not the other parties to this case. Staff and Public Counsel are the only parties who are included in this docket by law rather than by filing a petition to intervene and they have a broader interest in the docket than that stated by the intervenors. The intervenors' interests in this docket do not touch on issues to which the Highly Confidential information may be relevant. For these reasons, Qwest believes it is reasonable to limit access as described herein.
- 4 In accordance with the requirements of WAC 480-07-423, the Declaration of David L. Teitzel accompanies and supports this motion.

DATED this 5th day of January, 2007.

QWEST

---

Lisa A. Anderl, WSBA #13236  
Adam L. Sherr, WSBA #25291  
1600 7<sup>th</sup> Avenue, Room 3206  
Seattle, WA 98191  
Phone: (206) 398-2500