

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

THE CENTURLINK COMPANIES
– QWEST CORPORATION;
CENTURYTEL OF WASHINGTON;
CENTURYTEL OF INTERISLAND;
CENTURYTEL OF COWICHE;
AND UNITED TELEPHONE
COMPANY OF THE NORTHWEST

To be Regulated Under an Alternative
Form of Regulation Pursuant to RCW
80.36.135.

DOCKET NO. UT-130477

MOTION FOR HIGHLY
CONFIDENTIAL PROTECTIVE
ORDER

- 1 Pursuant to WAC 480-07-420(3) CenturyLink moves the Commission to enter a supplemental protective order governing highly confidential/competitively information. In support, CenturyLink states that certain documents requested in this matter are similar or identical to information that has previously been identified and protected as Highly Confidential in other proceedings.
- 2 For example, Staff Data Request #30 asks directly for the Broadband Report that was filed under Highly Confidential protection in the merger proceeding, Docket No. UT-100820. Additionally, Public Counsel has requested data on broadband take rates by wirecenter which

CenturyLink considers to be highly confidential and competitively sensitive. Public Counsel indicated that “Public Counsel would not object to amendment of the protective order in the case to cover highly confidential material.”

3 Prior to the filing of this motion, undersigned counsel sent an e-mail polling counsel for the other parties on this issue. Staff, Integra, and DoD/FEA have all stated that they have no objection to the standard form Highly Confidential Protective Order under the circumstances in this case. Sprint’s position is “a qualified non-opposition to [the] motion with the reservation of its right to challenge this classification if it is used to with-hold information from Sprint subject matter experts responsive to current or future Sprint data requests.” CenturyLink has responded that it recognizes the right of a party to challenge a designation but cannot agree at this time that responses to Sprint data requests will not contain Highly Confidential information.

4 Issuance of an additional protective order to allow for a Highly Confidential designation is consistent with the public interest as it will encourage disclosure, while offering CenturyLink additional assurances that their highly sensitive information will not be disclosed in a way that might result in competitive harm.

Respectfully submitted this 29th day of May, 2013.

CENTURYLINK

/s/ Lisa A. Anderl

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