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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE APPLICATION OF
QWEST CORPORATION
REGARDING THE SALE AND TRANSFER OF QWEST
DEX TO DEX HOLDINGS, LLC, A NON-AFFILIATE.

DOCKET No. UT-021120

**WEBTEC's RESPONSE TO
PUBLIC COUNSEL'S PETITION
FOR REVIEW OF AMENDED
PROTECTIVE ORDER**

Pursuant to the *Notice of Date of Response to Petitions for Review of Order Amending Protective Order* entered in this matter on October 17, 2002, WeBTEC hereby submits its response to Public Counsel's Petition for Review of Amended Protective Order. Public Counsel raises some additional issues not discussed in WeBTEC's Petition for Review of First Supplemental Order. In whole, WeBTEC agrees with Public Counsel's arguments and supports Public Counsel's Petition.

Through its Petition for Review, WeBTEC has already moved to vacate the *First Supplemental Order* in this matter. If the Commission chooses to amend, rather than vacate, the previously entered order, WeBTEC asks that any attorney's administrative staff, including, specifically, legal assistants working directly with attorneys in this matter, be allowed access to highly confidential documents. Not having access to these materials presents practical problems related to case preparation and management, including, but not limited to, testimony drafting, review, editing, cross examination and exhibit preparation and a host of redaction activities. Further, briefs and motions must be reproduced and filed in both public and

1 confidential versions. There is no practical way of limiting access to “highly confidential”
2 information across the spectrum of activities in this case. Accordingly, access to these
3 materials must be allowed. This is particularly true since outside counsel for WeBTEC, a
4 group of non-competitors, have already entered and filed the appropriate “Exhibit A (Attorney
5 Agreement)” to the Protective Order in this matter which binds them to confidentiality.
6

7 RESPECTFULLY SUBMITTED this 24th day of October 2002.

8 **ATER WYNNE LLP**

9 By: _____
10 Arthur A. Butler, WSBA #04678
11 Lisa F. Rackner

12 ATTORNEYS FOR WEBTEC
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