

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

QWEST CORPORATION

Petition for Commission Approval of
2007 Additions to Non-Impaired Wire
Center List

DOCKET NO. UT-073033

JOINT MOTION TO MODIFY
PROTECTIVE ORDER

1 Qwest Corporation (“Qwest”), on behalf of Covad Communications Company, Eschelon Telecom, Inc., McLeodUSA Telecommunications Services, Inc., Integra Telecom of Washington, Inc. and XO Communications Services, Inc. (collectively, “Joint CLECs”) and itself (collectively, the “Parties”), hereby requests that the Commission modify the protective order in this proceeding¹ in the manner shown in Attachment 1. The Parties respectfully request that the protective order be modified as promptly as possible to permit the Joint CLECs sufficient time to evaluate Qwest’s June 22, 2007 and June 29, 2007 filings in this docket and, possibly, to prepare objections to Qwest’s designation of additional non-impaired wire centers.

2 Paragraph 15 of Order No. 1 provides that the “Commission may modify this Order on motion

¹ *Order No. 1 (June 28, 2007) (“Order No. 1”).*

of a participant or on its own motion upon reasonable prior notice to the participants and an opportunity for hearing.” The Parties jointly request to substantive changes to Order No. 1: elimination of the 10-day notice and waiting period² and the prohibition on participant employees accessing Highly Confidential information.³ The Parties also recommend two non-substantive modifications, as shown in Attachment 1.⁴

3 Following the Commission’s timely entry of Order No. 1, the Parties have consulted and agree that the 10-day waiting period and the limitation to outside experts are not necessary in this case and would only serve to encumber the Parties’ efforts to make this case as efficient as possible. The Parties’ settlement agreement (filed in Docket No. UT-073035) provides the Joint CLECs thirty (30) days to object to Qwest’s additional non-impaired wire center designations.⁵ The 10-day waiting period will unnecessarily encumber the Joint CLECs’ ability to evaluate Qwest’s data (filed June 29, 2007) and prepare an objection, if necessary, within 30 days. The restriction of Highly Confidential information to outside experts may also encumber the Parties without corresponding benefit.

² Order No. 1, ¶ 7.

³ Order No. 1, ¶ 33.

⁴ It appears that Order No. 1 includes typographical errors in paragraphs 26 and 35 regarding references to earlier paragraphs. For the sake of clarity, the Parties recommend these minor errors be corrected as well.

⁵ See Docket No. UT-073035, Petition for Consideration and Approval of Settlement, Attachment 1 (Multi-State Settlement Agreement Regarding Wire Center Designations and Related Issues), § VI.F.1 (page 11 of 18).

4 For these reasons, the Parties jointly request modification of protective order, as set forth in Attachment 1. The Parties appreciate the Commission's prompt attention to this matter and apologize for burdening the Commission with this request.

DATED this 3rd day of July, 2007.

QWEST

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