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BEFORE THE ARIZONA CORPORATION COMMISSION

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2 MARC SPITZER
Chairman
3 WILILAM A. MUNDELL
Commissioner
4 JEFF HATCH-MILLER
Commissioner
5 MIKE GLEASON
Commissioner
6 KRISTIN K. MAYES
Commissioner
7

2004 AUG 17 P 3: 17

Arizona Corporation Commission

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AZ CORP COMMISSION
DOCUMENT CONTROL

AUG 17 2004

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8 IN THE MATTER OF QWEST CORPORATION'S
9 FILING OF RENEWED PRICE REGULATION
10 PLAN

Docket No. T-01051B-03-0454

11 IN THE MATTER OF THE INVESTIGATION OF
12 THE COST OF TELECOMMUNICATIONS
13 ACCESS

Docket No. T-00000D-00-0672

STAFF'S REPLY TO AT&T MOTION FOR PROTECTIVE ORDER

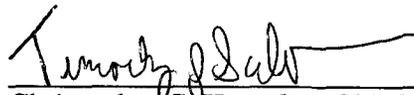
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15 Staff hereby responds to the Motion for a Protective Order filed by AT&T Communications of
16 the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T"). Staff believes that a protective
17 order may be appropriate in this case. There are a large number of parties in this case, many of whom
18 are conducting discovery. This has resulted in Staff entering into numerous protective agreements
19 with other parties. It would be burdensome to require every party to enter into protective agreements
20 with every other party. Having one protective order that is applicable to all parties will result a
21 standardized, smoother process for exchanging confidential data. Accordingly, Staff generally
22 supports AT&T's motion.

23 Staff fully supports the issues and proposed language raised by RUCO in its response to
24 AT&T's motion. RUCO's proposed language appropriately requires that the burden of demonstrating
25 that material is entitled to confidential (or highly confidential) treatment remains on the party
26 requesting confidential (or highly confidential) treatment.

27 ...

1 Staff also requests one further modification to AT&T's proposed order. The proposed order
2 limits the number of in-house experts allowed to view highly confidential information to five. Staff
3 requests that the number of in-house experts allowed to review highly confidential information be
4 increased to six, at least as it applies to Staff. AT&T's proposed limit of five makes sense when
5 applied to competitors, because one competitor is naturally reluctant to share highly confidential
6 information with the in-house personnel of its competitors. However, these concerns do not apply
7 with the same force to Staff. Further, because of Staff's heavy workload, Staff has had to involve
8 numerous persons in reviewing data and preparing testimony in this case. Accordingly, Staff requests
9 that it be allowed six in-house experts to view highly confidential data.

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11 RESPECTFULLY SUBMITTED this 17th day of August, 2004.

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15 

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21 Original and 13 copies of the foregoing
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with:

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25 Copy of the foregoing mailed this 17th
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