

**STATE OF IOWA
DEPARTMENT OF COMMERCE
IOWA UTILITIES BOARD**

In the Matter of

The Complaint of Carolyn Frahm

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) **Docket No. FCU-2013-0007**
) **(C-2013-0025)**
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VERIZON’S MOTION FOR PROTECTIVE ORDER

Pursuant to 199 Iowa Administrative Code 1.9(6) and Iowa Code § 22.7, MCI Communications Services, Inc. d/b/a Verizon Business Services (“Verizon”) moves for a protective order precluding public inspection of three confidential Verizon data request responses that the Iowa Office of Consumer Advocate (“OCA”) included in the confidential version of the OCA Report filed in this proceeding on November 13, 2014, as well as all portions of the confidential OCA Report and all subsequent filings in this proceeding quoting therefrom.

1. The OCA Report included three confidential Verizon data request responses, denoted as “OCA Ex. V-17 Confidential,” “OCA Ex. V-18 Confidential” and “OCA Ex. V-19 Confidential.”

2. Verizon moves for a protective order precluding public inspection of the confidential attachment to OCA Ex. V-17 Confidential because it contains customer-specific information relating to the long distance services of Complainant Carolyn Frahm that constitutes customer proprietary network information protected from disclosure by 47 U.S.C. 222.

3. Verizon moves for a protective order precluding public inspection of OCA Ex. V-18 Confidential because it contains competitively-sensitive information regarding vendors of wholesale services to Verizon and Verizon’s prioritization of its use of these vendors that

Verizon considers to be confidential and trade secret information pursuant to Iowa Code § 550.2.4. This vendor information derives independent economic value, actual or potential, from not being generally known to, and not readily ascertainable by proper means by competitors of Verizon that are able to obtain economic value from its disclosure or use. Verizon does not disclose the information publicly, and takes pains to limit its availability to only those employees with a need to know the information in conjunction with the performance of their duties. Accordingly, this information may be withheld from public records under Iowa Code § 22.7(3) and § 22.7(6).

4. Verizon moves for a protective order precluding public inspection of OCA Ex. V-19 Confidential because it contains competitively-sensitive information about Verizon's document retention policies that Verizon considers to be confidential and trade secret information pursuant to Iowa Code § 550.2.4. This information derives independent economic value, actual or potential, from not being generally known to, and not readily ascertainable by proper means by competitors of Verizon that are able to obtain economic value from its disclosure or use. Verizon does not publicly disclose the Verizon Records Retention Schedule. Accordingly, this information may be withheld from public records under Iowa Code § 22.7(3) and § 22.7(6).

5. Verizon provides the accompanying affidavit of Robert Mutzenback, Vice President – Taxes, in support of this motion.

WHEREFORE, for the reasons stated above, MCI Communications Services, Inc. d/b/a Verizon Business Services respectfully requests that the Board enter a protective order precluding public inspection of OCA Ex. V-17 Confidential, OCA Ex. V-18 Confidential and OCA Ex. V-19 Confidential, as well as all portions of the confidential OCA Report and all subsequent filings in this proceeding quoting therefrom.

Dated: November 24, 2014

**MCI Communications Services, Inc. d/b/a Verizon
Business Services.**

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